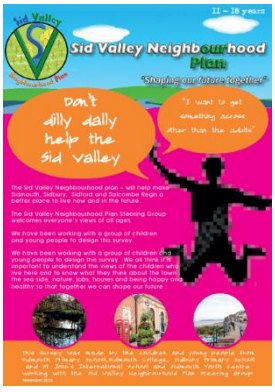
SID VALLEY NEIGHBOURHOOD PLAN

CONSULTATION STATEMENT

Submitted by Sidmouth Town Council

Prepared by the Sid Valley Neighbourhood Plan Steering Group

November 2018



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Section 1

Introduction - Consultation Statement Purpose

1.1. This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out what a Consultation Statement should contain:

a) Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
b) Explain how they were consulted;
c) Summarise the main issues and concerns raised by the persons consulted;
d) Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

1.2. A greater level of consultation has been undertaken than the legislation requires, and this is set out in detail here. It is not the intention of this Consultation Statement to replicate what is in these detailed reports but to summarise the content and show how this consultation has influenced the formation of Sid Valley's Neighbourhood Plan.

1.3. The Steering Group for the NP was formed in March 2016 comprising representatives from the community and three town councillors. This steering group has led the Neighbourhood Plan process on behalf of Sidmouth Town Council.

Details of the persons and bodies who were consulted about the proposed neighbourhood development plan

1.4. The following groups were consulted during the preparation of the NP:

- Residents via public meetings and 2 comprehensive surveys distributed to all residents and available electronically to all throughout the area
- Special resident groups who might otherwise not have engaged, especially children and young people through a special survey and engagement groups
- A place based exercise ensuring representative groups were engaged
- Businesses and special interest group survey
- Statutory consultees including East Devon District Council

Explanation of how consultation took place

Consultation phases

1.5. Right from the start local people were involved in the decision to establish a Sid Valley Neighbourhood Plan. Three consultation phases took place

a) Consultation about developing a neighbourhood plan and establishing a steering group.
b) Consultation throughout the preparation of the plan including residents' surveys, business surveys, children and young people's surveys, place analysis, public meetings and a constant e-presence
c) Pre-Submission Consultation

A. Consultation about developing a neighbourhood plan

1.6. The Sid Valley is a unique place with its own set of issues and it was for this reason that a Task & Finish Forum was set up in July 2015 led by Councillor Louise Cole to decide whether to go ahead with a Neighbourhood Plan. The Task and Finish Forum reported to Sidmouth Town Council making recommendation that a Neighbourhood plan for the Sid Valley which brought the whole community together (Sidmouth, Salcombe Regis, Sidbury and Sidford) to create a shared sense of place, now and for the future, was appropriate, useful and achievable. It represented an exciting challenge that would have long term benefits. As such, public and community engagement and consultation sat at the heart of the work of preparing the Neighbourhood Plan under the Localism Act 2011. Public opinion was canvassed and an open public meeting took place which was well attended. As a result

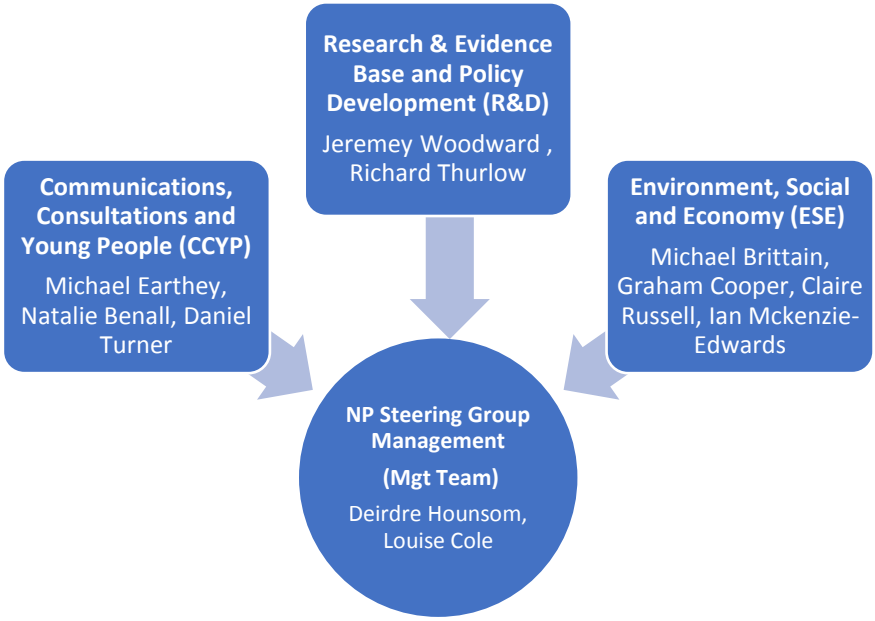
of this Sidmouth Town Council voted in December 2015 to proceed and to establish a Neighbourhood Plan Steering Group to develop the plan.

Setting up the Steering Group

1.7. A public meeting was held on the 19th January 2016 covered by the Sidmouth Herald asking for interested parties to apply to Sidmouth Town Council if they were interested in joining the Steering Group. The purpose was to publicise the submission of the application to designate the Sid Valley as a neighbourhood plan area, to create a Neighbourhood Forum, invite comments, explain the nature and potential of the Forum and propose the draft constitution. Membership of the Steering Group was open to:

- residents living in the Area, either as individual members or via representative bodies;
- local businesses, organisations and individuals who work in the Area;
- Sidmouth Town Councillors.

1.8. A volunteer recruitment process was set up and applications invited against weighted criteria for selection. Interviews were held by the Town Council to appoint a chair for the steering group and representative members. The new steering group held its first meeting on 21st March 2016 and received Neighbourhood Area Designation status approval from East Devon District Council on March 31st 2016. Here is the final structure of the Steering Group adopted at the beginning of the process, this later changed to reflect the consultation feedback and as themes developed from these community responses.



B Consultation during the process of developing the Draft Sid Valley Neighbourhood Plan.

1.9. The Steering Group once formed has been keen to provide a wide range of opportunities for residents to participate in the preparation of the draft Plan to ensure that it reflects the priorities and concerns of local people and to keep them informed of emerging issues and policy development. These have included: a website set up specifically for the purpose in addition to full details of all surveys and development being posted on Sidmouth Town Council website. Details of

on -going developments and the analysis of these initial surveys were posted on the Town Council website http://www.sidmouth.gov.uk/neighbourhood-plan.

The Sid Valley Neighbourhood Plan Steering Group developed terms of reference published on the Sidmouth Town Council website http://sidmouth.gov.uk/images/terms_of_reference.pdf to ensure planning, allocation of tasks and a delivery plan was developed under the leadership of the Chair.

The Steering Group used Basecamp software to share and store all information during the development of the plan process. A set of protocols including a statement on transparency and neutrality were developed governing decision making and communications and a number of project timelines were developed, reviewed and renewed throughout the development period. The Chair and Vice Chair of the SVNP reported as a standing item to full council meetings of Sidmouth Town Council to update on progress.

1.10. The report of the NP TAFF suggested the plan would include these thematic areas drawn from the Local Plan as follows:

1. Housing Needs/Affordable Housing/Family and Retirement needs
2. Transport & Traffic/ Town centre access/parking/park and ride
3. Employment
4. East End of Sidmouth/Port Royal
5. Beach Management
6. Tourism/Hotels/retention/alternative use
7. Design and Local Distinctiveness
8. Trees and Development Sites
9. Display of Advertisements
10. Community Assets
11. Natural environment/AONB
12. Allocation of individual sites
13. General opportunities for enhancement of the Town
14. Priority Community Actions which emerge through consultation

Access to information throughout the process

1.11. Public Information Sources were available throughout the process through:

Website

Sidmouth Town Council maintained an up to date Neighbourhood Planning webpage that summarises the powers available under Neighbourhood Planning and the key stages to developing Neighbourhood Planning http://www.sidmouth.gov.uk/neighbourhood-plan
There was a unique Steering Group website www.sidvalleyneighbourhoodplan.com.
Both websites included information about upcoming events, minutes of past meetings, information on neighbourhood planning in general and ways to get in touch.
Social media The Steering Group set up Facebook page and a Twitter account
https://twitter.com/sidvalleyplan
https://www.facebook.com/SidValleyNeighbourhoodPlan/

1.12. A record of consultation events appears on both the Sidmouth Town Council website and the dedicated Sid Valley Plan website. Publicity and information posters on noticeboards in the area, social media and on-going publicity in **The Sidmouth Herald** were the main channels of communication used throughout the process. Regular updates of the consultation progress and its findings were given through presentations at full meetings of Sidmouth Town Council and the Tourism and Economy Committee throughout the process.

Open Public Meetings.

1.13. The Steering Group held launch meetings in five different accessible venues to gather views, priorities and aspirations from the community to feed into the design of the consultations and to the development of the draft plan vision for the Sid Valley. These public drop in sessions, examples of which are in the photos below, were held between 8th June – 7th July 2016, for the public to find out more about the neighbourhood Plan, ask questions and give their input. Boards with various topics listed gave the public an opportunity to indicate what was important to them. There were 6 discussion boards showing: a map of the boundary area allowing attendees used post-it notes to add their comments. Afterwards, the discussion boards were photographed and used for publicity purposes and to start to formulate the policy areas. A Sid Valley Neighbourhood Plan publicity banner was displayed in the Town Centre to raise awareness and generate interest of the plan development process and opportunities to contribute. The photos below depict some of our public communication tools and processes.

1.14. These meetings informed the development of a draft vision statement for the neighbourhood plan on which to consult and the direction the questions in the first Resident Survey would take. The vision statement and the context within the Sid Valley Neighbourhood Plan was reviewed and refine following the subsequent consultation processes. The development of the vision was consultative aiming to present with clarity the aspirations for the future collectively across all ages and groups across the community.

The First Household Questionnaire June 2016

1.15. This print version survey was distributed via a local delivery method to all households within the Neighbourhood Plan area with clearly described drop off points throughout the plan area seen in the materials below. The survey could also be accessed online. Extra copies of the **First Household Questionnaire** were available at The Library, at Sidmouth Town Council offices and at East Devon District Council Offices. See examples of the consultation material concerning collection points below demonstrating our efforts to enable access to the process for all. The purpose of this first survey was to inform the development of detailed policies for further consultation with the community. 589 paper surveys were returned and 123 online which represented responses from 1108 residents.

Business & Special Interest Groups Survey October 2016 January 2017

1.16. This was distributed by email with a link to an online survey to businesses and groups operating in the Sid Valley to try to understand the views of people who own, run and manage businesses and groups in the area. The Steering Group felt that these views could give a wider perspective which would help us to balance the needs of the whole population through the development of the neighbourhood Plan policies. 104 responses were received representing over 1600 employees and community group or association members.

The Children's and Young Persons Survey November 2016

1.17. The Steering Group working with the schools in the Sid Valley recruited a Children and Young People's Advisory Group, this was strongly felt to be important to understand the views of the current and future population of the Sid Valley and to give young people a voice. The role of the group was to be involved in the design of the consultation itself including question content development, use of language, visual appeal and engagement methods. The Advisory Group recommended two age appropriate surveys. We received 477 completed questionnaires from the younger age group (5 to 11 years) and 622 from the 11 – 18 years age group. Respondents were asked to provide their thoughts in 8 free-text questions in narrative style, listing facilities or issues that interested or concerned them along with a larger number of multiple choice questions. Within the primary age survey, children were given the option in question 9 to either write or draw their ideas about what they want the Sid Valley to be like in the future.

1.18. The Children and Young Persons Survey was distributed and completed with the help of the Advisory Group and the schools concerned who gave tutor time for the surveys to be filled out as seen in the photos below. Local business donated prizes in order to increase participation in the survey and ensure that young people's views were taken into account in developing the draft plan policies. 1099 Children and Young People completed the survey in total. Young people from the Children and Young People's Group presented to the Annual Town Assembly Meeting of Sidmouth Town Council to share the priorities for young people with councillors and inform the thinking of the development of the plan in April 2016.

Place Analysis

1.19. The Steering Group invited a consultancy, Creating Excellence who are part of the South West Design Board, to organise a "Define the Vision, Shape the Future" Sid Valley Neighbourhood Plan Stakeholder and Residents Event. This workshop delivered jointly by the SVNP Steering Group and Creating Excellence was facilitated to create conversations and gather views and insights from the community from which to produce a **Place Analysis,** to sit alongside the final Neighbourhood Plan and designed to inform and be read in conjunction with the policies. The workshop was held on 27 January 2017 at Kennaway House and consisted of a morning session and an afternoon session. It involved two different sets of local representatives, 89 people in total, drawn from business owners, clubs and societies, residents and young people from local schools. Creating Excellence also conducted a workshop and walkabout event for the SVNP Steering Group to inform understanding of the specific character areas defined in the Place Analysis.

Second Residents Survey June 2017

1.20. This second survey gathered together all the evidence collected from ongoing research and engagement to formulate a second and final residents' questionnaire. This was distributed by a fulfilment house to every household in the Sid Valley at the end of May and the consultation closed on 30th June 2017.

1.21. During the consultation period the group had a regular weekend presence in the Market Square Sidmouth. These events were to remind residents to complete the second and final Residents Survey and give out extra copies if residents had misplaced their original copy.

1.22. Throughout this time, the residents of the Sid Valley were also kept informed by regular articles in the Sidmouth Herald, updates on both websites in addition to Facebook and Twitter posts.

C. PRE-SUBMISSION CONSULTATION FEBRUARY - APRIL 2018

1.23. This consultation was undertaken between 28th Feb and the 12th April 2018 on the submitted Sid Valley Neighbourhood Plan. Appendix 1 lists all the responses received and the actions taken by the Steering Group to respond to, or amend the Neighbourhood Plan as a result of these comments.

1.24. A digital copy of the draft Neighbourhood Plan was sent to over a hundred organisations, both local and national. This list was based on a statutory consultee list supplied by EDDC.

1.25. A paper copy of the draft plan was placed in Sidmouth Library throughout the consultation period for consultation by local residents in addition to paper copies being available to view at Sidmouth Town Council and EDDC headquarters at The Knowle.

1.26. A digital copy was made available on the Sidmouth Town Council website and the Sid Valley Plan website. A response form was made available to all those consulted on the Plan. Publicity for this stage of the consultation included articles in the Sidmouth Herald and through emails to local organisations and individuals.

1.27. A public event was held at All Saints Church Hall on Wednesday, March 21, between 3pm and 6.30pm where members of the steering group were available to answer questions from members of the public.

Summaries of the main issues and concerns raised by those consulted

1.28. Following all consultations, and extensive scoping exercises, the comments received were grouped into the main concerns and issues raised by the consultees. These were grouped into six themes:

- Built & Natural Environment
- Housing
- Transport
- Community
- Eastern Town Development
- Economic Resilience

The SVNP Steering Group captured the emerging themes in the following infographic which was produced to help to hold and communicate these themes during subsequent consultations.

1.29. Common themes emerged throughout the various consultations but specific concerns and issues as they arose from each survey and consultation phase are set out in more detail below. Supporting material for this phase can be found in on the websites and within the Appendices which form part of the SVNP.

The First Residents Survey

1.30. The common themes running through this from all age groups within the community was the awareness and sense of place and a desire to guard and protect the beauty of not only the landscape but also ensure that the historic built environment was conserved and that any new development or refurbishment should complement this sense of place. There was also an acknowledgement that the property market suffered from the effects of incoming purchasers who could afford higher prices therefore pricing younger first-time buyers out of the market. There was an acknowledgement that the ratio of residents over sixty years was likely to increase if the property market, with a limited supply of affordable homes remained unchanged.

The Business & Special Interest Groups Survey

1.31. Many respondents complained about high rents and business rates making businesses unsustainable in a town that depends largely on seasonal trade. There was general acknowledgement that the various existing festivals brought welcome revenue into the Parish and

a general opinion that these festivals could be expanded and that Sidmouth might be positioned as a Festival Town.

Children and Young Persons Survey

1.32. Again, even amongst the younger respondents there was general agreement which reflected the views in the First Residents Survey. The young people said that their favourite things about living in the Sid Valley were the sea, the beach and outdoor activities, the countryside and the fact that it was a safe town. The young people all felt happy to be living in the Sid Valley and many of the teenagers said that they would consider returning to the Sid Valley after university. Some remarked on the fact that the Sid Valley could attract high tech, environmentally friendly industries which would allow the younger generation to live in the area in addition to assisting the economy of the Sid Valley. The most common issues raised in the children and young people's survey responses were depicted through the info graphic below as part of the analysis of responses.

Kennaway House Know Your Place Workshop

1.33. This event was produced and managed by our consultants Creating Excellence and participants were seated at various themed tables according to their preferences to discuss the issues and proposed policies around that specific policy area. A brief resume of the topics and ideas was given by one person from each table and the end of each session after which participants moved to a different table to discuss a different policy area.

1.34. Large scale maps of community facilities, green spaces and transport routes in and out of the Sid Valley were provided. The recurring theme of a strong sense of place was further recognised and consolidated with an equally strong wish to protect the AONB which surrounds the Sid Valley.

"Landscape is a key issue, not least because the Plan area is set entirely within the nationally designated landscape of the East Devon AONB. The AONB designation washes over the smaller settlements in the NP area and directly abuts the 'Built up Areas' boundary of Sidmouth (Place Analysis 3.1.0 Wider landscape CONTEXT AND AONB); Development …must be compatible with national policy and the AONB Management Plan."

1.35. There was also general agreement that whilst protecting the assets that make the Sid Valley unique, there was a need to enhance our tourism offer and to try and make it multi-generational by expanding on existing festival such as Folk week, The Science festival, the Literary Festival and the Walking Festival. These events together with Sidmouth in Bloom and a professional summer season of plays at the Manor Pavilion boost the economy of the town substantially throughout the year. This together with events such as the Red Arrow Display which attracts thousands of people from all over East Devon and the annual Regatta and Carnival all provide a welcome financial boost to the Sid Valley in terms of hotel and boarding house accommodation and increased retail footfall in the town. A report of the Know Your Place workshop which helped to shape the Sid Valley Neighbourhood Plans is included in Appendix 2.

The Second Residents Survey

1.36. This survey expanded on all the previous research and the questions were formulated to confirm the evidence previously collected of what the residents and businesses of the Sid Valley wanted to see happen during the next few years.

1.37. Housing again was a difficult theme, considering the lack of available land without encroaching substantially into the AONB but again a popular comment across the generations was that any housing built in the future should be available not just as market housing but allowing for different types of tenure and with a focus on affordable homes. The Steering group used this resident's survey to confirm that the emerging policies aligned with the ideas and wishes of the local community.

Pre – Submission Consultation

1.38. The comments were collated on a spreadsheet according to the Policy Areas as they appear in the SVNP and are included in Appendix 1 together with responses from the Steering Group. What follows is a summary of the concerns raised.

General Comments

1.39. Comments were received from 12 organisations including Historic England, Natural England, Highways England, the East Devon AONB, the Sid Vale Association, South Somerset District Council, South West Water and National Grid and individuals which are summarised in the fourth column of the spreadsheet as the response from STC. Most comments were broadly supportive of the process and helpful in making suggestions to improved wording and clarity.

Built & Natural Environment

1.40. Eight responses were received for these policies mainly from developers, Savills, Bloor Homes and Persimmon with a lengthy comment from EDDC advising on clarification and clearer wording. Many comments were received acknowledging the need to list all the places and views requiring protection in the final NP submission version of the SVNP. Observations were made that maps could be contained within the NP itself and not just referenced to the Place Analysis. All comments were supportive of retaining the character of Sidmouth and the whole of the Sid Valley.

Green Space

1.41. Comments were received from 6 organisations and individuals which are summarised individually in the table with the NP's' response.

Housing

1.42. Several property developers produced extensive written representations concerned that the draft policies might restrict development. These were Savills, Persimmon, Bloor Homes and Richard Heard. EDDC sent in helpful and lengthy comments again seeking clarification of housing policies around what were considered some potentially restrictive policies.

Access & Connectivity

1.43. Proposals included encouraging walking, cycling and the improvement of parking to reduce congestion and on street parking In Sidmouth Town Centre. Main topics were: a) safer cycle routes, crossing points and linking cycle routes to any new housing development b) Developing a cycle link from Sidmouth to Feniton. A Sustrans Report is included within the Appendices of the Neighbourhood Plan itself.

Economic Resilience

1.44. Comments, some of which related to a proposed commercial development of Sidford Fields were received from EDDC (4) Richard Heard, Keith Gillanders and John Labrum and are summarised in the table with the NP's response.

Protection and Enhancement of Community Facilities and Assets

1.45. No major disagreement or comment within this policy area.

Eastern Town/ Port Royal

1.46. Respondents were Natural England, EDDC, Richard Eley, John Labrum, Tim & Mary Bray, Keith Gillanders and the Sid Vale Association. Comments received were: "In terms of the former Drill Hall, this building had no connection to the sea and it was purchased by East Devon District Council from the Wessex Reserve Forces and Cadets Association. The money received by the Wessex Reserve Forces and Cadets Association contributed to establishment of a new cadets building" Other comments were mostly supportive of any redevelopment. Other omments, many of which related to a proposed re- development of Eastern Town/ Port Royal were received from 5 organisations and individuals which are summarised individually in the table with the Steering Group's response. Comments related to designations of public/private space, the future of the Ham, protecting the continued use of local facilities and environmental sustainability

Section 2

2. How these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

2.1. The Steering Group has taken account of the views and concerns of local people during every stage of the development of the Plan. The policies were developed directly as a result of the comments received and the main areas of interest and concern and how these have been dealt with in the plan are summarised below.

Built & Natural Environment

2.2. This has been a recurrent theme during all of the consultation processes and many of the policies in the plan have been developed as a result of these local views and concerns. The following policies have been developed in response to this i.e. :

- Protection of Key Views
- Settlement Coalescence Sidford to Sidbury
- Green Corridors
- Local Green Space Designation
- Protected Open Space
- Infill Development and Extensions
- Local Distinctiveness
- Light Pollution

2.3. The NP also contains a range of Community Actions to support the strong protection of the natural environment and the historic character as strongly supported during all of the consultation phases. I.e. Energy Efficiency, Biodiversity, Maintain the Tree Canopy, Promote the Sid Valley in Bloom, Gardens and Boundaries, Walls. Generally these policies were well received during the final

statutory consultation stage and the final plan has been amended to tighten up some of the descriptions and maps as requested by several respondents.

2.4. Comments during the statutory consultation were largely supportive of protecting the environment with comments seeking to ensure that maps were large and clear enough and all relevant policies noted. This has been done in the final draft plan. There were comments in relation to coalescence between built up areas and as a result policies have been modified to provide more clarity.

Housing

2.5. This is a complex policy area where it is necessary to balance the desire to protect the environment by limiting new build and overcrowding through infill sites, versus the needs of young families in particular for suitable housing and the requirements of the local planning authorities. This area was the one to receive most feedback during the statutory consultation phase. As can be seen from the paragraphs above these dichotomies were expressed during the first and second resident's surveys.

2.6. As has been described above and more fully in the appendix, several property developers produced extensive written representations. The Neighbourhood Plan could have taken a cautious approach to housing provision just by acknowledging that the Local Plan requirements were being met. This requires a balanced approach which is to allow development driven by the local connection policy but still protecting the special landscaped setting of the town and villages which is valued so highly by residents and visitors alike.

2.7. With reference to comments from Bloor Homes we refer to Policies 03 and 05 - which is the justification for the policies. The flood zones are vital eco-corridors so the flood zone maps indicate where the eco corridors are located. In answer to a comment made by Bloor Homes. SVNP has been prepared in the context of a recently adopted local plan and not an emerging local plan.

2.8. However, the steering group has considered these representations carefully and has amended its housing policies somewhat in response to them. A significant change to the final Sid Valley Neighbourhood Plan has been made in response to the pre submission consultation in response to concerns that the housing policies could be perceived as overly restrictive. In the final plan the combined policies 10 A and 10 B are designed to balance the evidence of the views of the community in relation to ensuring balanced communities and responsible development that is appropriate in scale and location as well as providing new homes which reflect local housing need and the need for affordable housing stock. The addition of the new Exceptions Sites Policy 10B addresses the concerns of Bloor Homes, Savills and Persimmons in particular, revised wording to Policy 11 is responsive to concerns around viability. Additional rationale has been included in the final Neighbourhood Plan demonstrating the SVNP Steering Group approach to the complexity presented by the need for new housing and for it to be viable to be balanced with the need to protect the environment and are sustainable and provide quality homes for people which benefit people's health and wellbeing. Policies 12, 13 and 14 have all been reworded to clarify and correct where wording was not clear or could confuse and to address the pre submission response concerns. Again further rationale and justification for all the housing policies has been included to give clear understanding of what the Sid Valley plan seeks to balance and achieve through more nuanced housing policies which reflect land availability and management of it with the flexibility to address local housing need.

Eastern Town Development

2.9. As the local district council were considering the future of eastern town during the preparation of NP there were lively debates about this during the consultation period. The NP has taken account

of the views expressed in preparing the NP as is evidenced through the following policies which seek to balance the expressed views of local people and the need to promote economic resilience for the town, the strong connection with the coastal identity of Sidmouth and its vibrant civil society. This is reflected through balanced Eastern Town policies which are designed to promote sensitive development which reflects the value and economic benefit of this strong sense of community identity.

Policies proposed:

- Eastern Town Redevelopment
- Eastern Town Access
- Eastern Town Maritime Heritage
- Eastern Town Community Assets

2.10. Community actions have also been included to support community aspirations including protection of the Ham, ideas for water based activities, the beach management plan, and the creation of a pie/jetty.

Community - Protection and Enhancement of Community Facilities and Assets

2.11. No major disagreement or comments were received within this policy area. The Safe Town policy has been amended slightly as a result of comments received.

Transport - Access & Connectivity

2.12. Proposals were initially developed in response to consultation including encouraging walking, cycling and the improvement of parking to reduce congestion and on street parking In Sidmouth Town Centre. Comments in relation to the draft policies mainly related to specific ideas on route or new sustrans routes. Policy 16 Loss of Parking was deleted following the statutory consultation as not needed.

Economic Resilience

2.13. There was a recognition throughout the consultation that economic resilience was essential for the local area, though there were also the concerns about potential overdevelopment as so many residents value the current environment. The policies developed for the NP sought to keep a balance between ensuring a good visitor attractiveness and distinctive shopping environment while allowing development on existing business land and supporting diversification. This seems to have been supported during the later consultations.

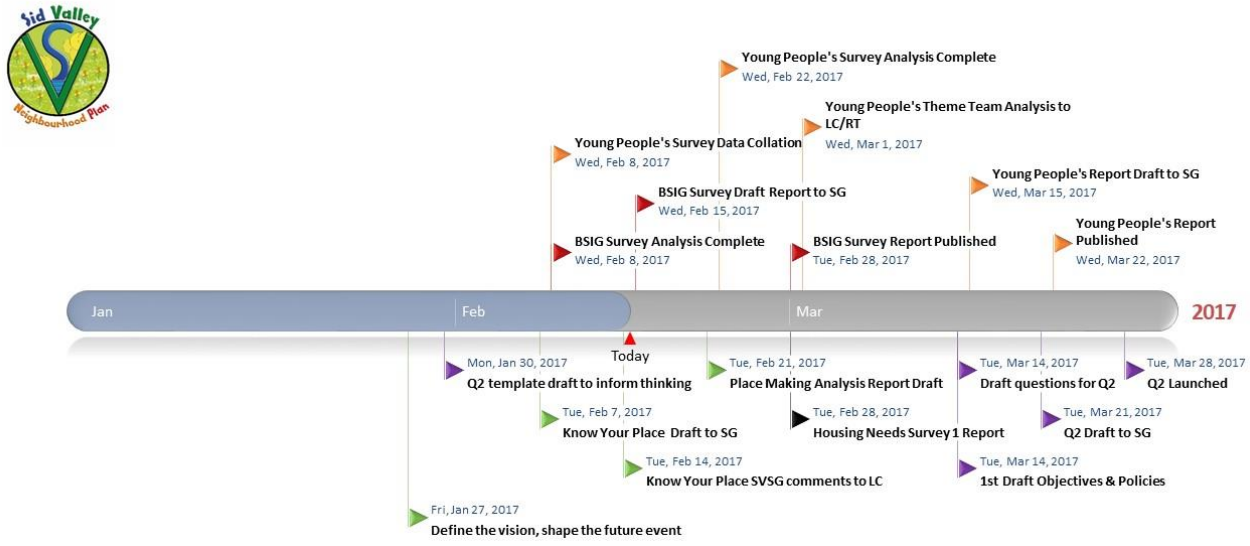
2.14. Comments, some of which related to a proposed commercial development of Sidford Fields were received In response to that the Steering Group have responded that: ”The Sidford site is a strategic policy of the Local Plan and the NP did not specifically address any issues concerning the proposed site.” Other policies in the NP including those in the Built and Natural Environment may be considered applicable. The SVNP is unable to specify as a Policy what must be built other than as stated in our policies on the Built and Natural Environment. Additional reference to the NPPF paragraph 22, Aim 4 in the Economic Resilience section clarifies the intention of this policy. The SVNP recognises that the Sidford Employment Land is a strategic site in the Local Plan and therefore cannot contravene the allocation of this site, however the policies within the Built and Natural Environment will be applicable to the development of this site and are designed to mitigate adverse development in terms of scale and impact on the natural environment.

Overview Timeline and Process Planning

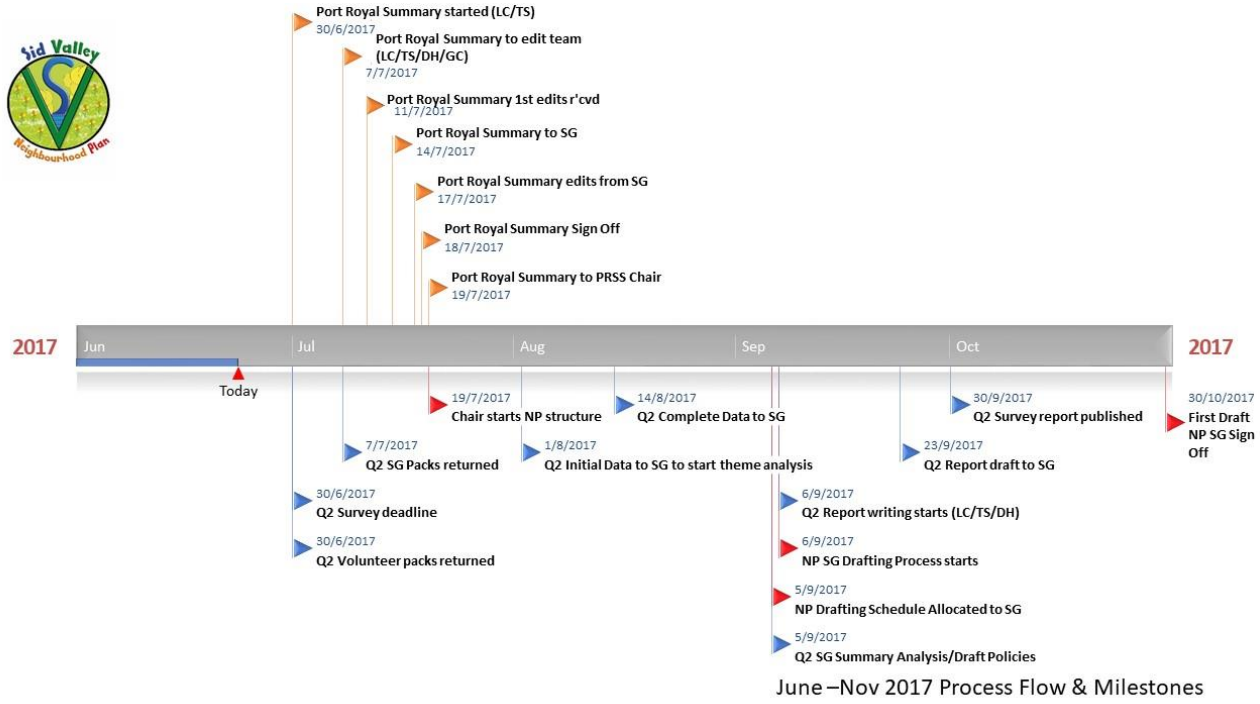
The Sid Valley Neighbourhood Plan Steering Group ran a series of public consultations since the start of the Neighbourhood Planning process which included;

- First Household Questionnaire – June & July 2016
- Business & Special Interest Groups Survey – September & October 2016
- Children and Young People's Survey - December 2016
- 'Have Your Say' consultation event at Kennaway House - January 2017
- Second Household Questionnaire Consultation May & June 2017
- Pre-submission Consultation 28th Feb and the 12th April 2018

The Sid Valley Neighbourhood Plan Steering Group used an excel project plan throughout the process to aid delivery of the plan and to plan the consultation processes. A number of timelines were also developed to help to progress the NP logically and sequentially with refinement of each stage fed by the previous one. The responses to our pre-submission consultation required considerable anaylsis and review of the draft NP and caused our original timescales to slip. The timelines below demonstrate our logic planning and planned timescales.



Jan –Mar 2017 Process Flow & Milestones



June –Nov 2017 Process Flow & Milestones

Conclusion

It should be noted that following the pre-submission consultation all of the evidence in the Sid Valley Neighbourhood Plan was reviewed and adjusted in the light of comments received to improve wording, clarify and make clear the intention of the policies. The NPPF references were all checked and references to the latest NPPF were added to add rigour to the document and ensure its relevance to the current national guidance framework.

The Sid Valley Neighbourhood Plan Steering Group have worked to incorporate and calibrate the views that have been fed into the plan development process from cross section of the community. The consultation, communication and engagement exercises were rigorous and inclusive, achieving very positive response rates and stretching way beyond the required consultation levels. This reflects the diligence and collective efforts to bring together a cohesive set of policies that accord with national guidance, the Local Plan and the views of the community and statutory stakeholders.

The Steering Group have worked closely with John Slater our Neighbourhood Plan Consultant, who has provided continuous training, feedback, suggested wording and clarity on what is permissible, legal and justified in a planning context for careful use, supply and management of land in the Sid Valley.

Appendix 1 Sid Valley Neighbourhood Plan Analysis of Pre Submission Consultation Responses April 2018

Statutory pre-submission consultation was undertaken between 28th Feb and the 12th April 2018 on the submitted Sid Valley Neighbourhood Plan. The table below is a summary of these representations. The full versions can be seen at **www.sidmouth.gov.uk/neighbourhoodplan**

Reference	Name	Summary of Representation		STC Comments
General	South Somerset District Council	Thank you for your email of 28th February, consulting South Somerset District Council as part of the Pre-Submission of the Sid Valley Neighbourhood Plan. Having read and duly considered the Plan, we wish not to comment		Noted
General	South West Water	Tim thank you for providing details of the above the content of which is noted and upon which South West Water has no comment at this time.		Noted
General	National Grid	Specific Comments. An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.		Noted
General	Highways. England	Thank you for providing Highways England with the opportunity to comment on the pre-submission version of the Sid Valley Neighbourhood Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in East Devon comprises the A30, M5 and A35. As the plan area is some distance from the SRN, we are satisfied that the plan's proposed policies will not impact on our network and we therefore have no comments to make. This response does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.		Noted
General	East Devon AONB	The AONB Management Plan is a key document for consideration in planning and development and it is important to ensure this is referenced appropriately in Neighbourhood Plans for areas within AONBs. In addition to any comments we have made on the attached (Neighbourhood Plan), we		We have referred to these documents in the text.

		would refer you to the Devon Landscape Policy Group Advice note 4 and the East Devon AONB guidance note.		
General	Natural England	Thank you for your consultation on the above dated 26 February 2018 Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England welcomes the preparation of the Neighbourhood Plan and recognises the effort that has gone into its development. We have a number of comments on the draft Plan which we hope you will find useful. These are set out below		Noted
General	Peter Wharton Hotel Riviera	The Hotel Riviera is at present in negotiation with East Devon District council to increase the quality of accommodation by adding an additional story to the building and increase the quantity of accommodation at the rear of the hotel. Naturally we would not want anything in the Neighbourhood plan to prevent this from being achieved.		The position regarding the negotiations with the East Devon planners is noted but it would be inappropriate to change policies to address particular discussions taking place
General	Persimmon	These representations are made on behalf of Persimmon Homes south-west in respect of the emerging Sidmouth Neighbourhood Plan. Persimmon Homes owns the freehold of land at Woolbrook as identified on the attached location plan and has consistently submitted details of its availability and feasibility to the SHLAA and SHMA. The matters as addressed below are not in order of priority or importance but are in the order that they are presented within the draft plan. Introduction/Vision The Company objects to the sequential testing methodology proposed in respect of developers having to demonstrate that all suitable alternative development sites have been explored before development on green-field sites may be considered. The draft Plan fails to quantify in any detail Sidmouth's specific housing need or indeed how it intends to respond to East Devon's housing requirements and the emerging housing requirements of the greater Exeter Plan area. It is highly likely that the aggregate housing need in Sidmouth will		Encouraging the reuse of brownfield sites is one of the core planning principles set out in the NPPF**.** Please see our exceptions policy included in response to a number of points raised. It is too early saying that it is far too early to be using the Greater Exeter Plan as it has not published any documentation apart from the issues Paper nor are there agreed housing figures and these are not anticipated until 2019. It may be that if the new Plan when adopted gives a higher figure for Sidmouth, the neighbourhood plan will have to be reviewed and look at the need for additional allocations to ensure any higher numbers are allocated by the neighbourhood plan. The Plan has been drawn up in the context of the adopted Local Plan's housing numbers and no additional housing numbers has been generated for East Devon yet, based

		outstrip the availability of viable brown-field sites. The plan should therefore positively seek to identify green-field development sites to accommodate this housing need and not rely on an ad-hoc and subjective assessment of brown-field availability from time to time against the benefits of green-field development.\ The plan fails to positively and proactively plan for new residential development. The East Devon local plan identifies minimum requirements for housing growth. The government's recent papers and statements could not be clearer on the county's obligations to bring forward new and more housing in sustainable locations without delay. The plan fails to follow this ethos in any shape or form. The company's land interests at Woolbrook are available immediately, sustainable (abutting existing residential development on two sides) and deliverable (given the land is owned freehold by Persimmon Homes Ltd).		on the new standard housing methodology. If the adopted Local Plan is reviewed and changes the housing requirement to be accommodated the plan will need to be reviewed. The availability of the land at Woolbrook, Sidbury and land adjoining the A3052 has been noted.
General	Savills	Savills have submitted a very lengthy set of documents which are being considered separately. Specific representations against each policy are detailed below.		Noted
General	Bloor Homes	On behalf of our client Bloor Homes South West Ltd ["Bloor Homes"], we write to provide representation to the Sid Valley Neighbourhood Plan (pre-submission draft plan consultation to 11 April 2018). Bloor Homes has an interest in land within the Neighbourhood Area, specifically land at Sidford High Street, Sidmouth (see Site Location Plan enclosed at Appendix 1). The Town Council will be aware of this land interest as Bloor Homes has participated in previous plan making for the area, and submitted detailed technical information relating to the availability and suitability of the site for future development. Given the above, Bloor Homes has an interest in policies and strategies set out in the emerging Neighbourhood Plan, and is concerned to ensure that an effective and deliverable Neighbourhood Plan for this area is achieved, which specifically responds to and reflects relevant national and local planning policy (as set out in the National Planning Policy Framework		Noted

		["NPPF"] and the Development Plan for East Devon). Our representations primarily focus on the following policies: • Policy 02 'Protection of Valued Views'; • Policy 03 'Settlement Coalescence and Green Wedges'; • Policy 10 'Housing Sites'; • Policy 11 'Affordable Housing'; and • Policy 15 'Park and Ride'.		
General	Keith Gillanders	Support the broad thrust of the plan's aims and the policies to achieve them. However, there is a lack of clarity over some of the detail, a need for strengthening where some policies are too weak, and a need for more information about implementation. Specific comments shown under relevant policies		Noted
General	SVA	Methodology, Page 7, Insert number of questionnaires distributed in order to state response rate		Noted
	SVA Richard Thurlow	Irregularity in the use of abbreviations and their use, Confusion in the use of "supported" and "refused" the latter being used in several policy texts. Only EDDC can approve or refuse a Planning Application		Noted
	Structure of the Sid Valley Neighbourhood plan			
Policy 01 Sid Valley Development Principles	Natural England	The Neighbourhood Plan area includes two sites of importance for biodiversity/geodiversity: • Sidmouth to West Bay Special Area of Conservation (SAC) which is a designation of European importance (Sidmouth to West Bay - Special Area of Conservation - SAC - Habitats Directive), and: • Ladram Bay to Sidmouth Site of Special Scientific Interest (SSSI) which is of national importance (https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1004003&SiteName=&countyCode=&responsiblePerson=CHRISTY+TOLLIDAY&SeaArea=&IFCAArea=).		Additional text has been inserted in to the relevant section of the plan **Noted**

		It is important that these designated features are referred to within the Neighbourhood Plan and that Neighbourhood Plan policies are screened to assess whether they are likely to result in significant effects on the environment or likely to have significant effects on a European site designated for its nature conservation interest. Further guidance on Strategic Environmental Assessment and Habitats Regulations Assessment is set out in Annex 1. We suggest you discuss the need for a screening report with East Devon District Council. The text on page 11 refers to a 'Coastal Protection Area' and 'Coastal Preservation Area'. Clarification is required about the nature of and justification for these areas and they should be shown clearly on a plan. If you are referring to an area already designated in another document (e.g. Heritage Coast or Coastal Preservation Area identified in the East Devon Local Plan (EDLP) this should be explained and a reference to that other document provided. Reference is also made to a 'built up area boundary' (BUAB). Clarification is sought on whether it is the intention to define this boundary within the neighbourhood plan or whether it is defined in another development plan document (e.g. East Devon Local Plan). If the boundary is to be defined in the Neighbourhood Plan it should bet shown clearly on a map.		The LPA will be aware of the designations when it screens the plan under both the SEA and the HRA. We have followed up with EDDC's NP Officer Phil Twamley and understand an SEA is not required for submission of the Sid Valley NP. The description has been amended to refer consistently to the Coastal Preservation Area and it will be made clear that this is a designation in the East Devon Local Plan. The text has been amended to confirm that the BUAB is as defined by the East Devon Local Plan
Policy 01 Sid Valley Development Principles	EDDC	The SVNP will promote the development of brownfield sites first' s Comment: Residential gardens that are not in built-up areas are Brownfield (see Dartford BC v DCLG). The NP group may need to clarify whether they mean to prioritise all brownfield sites, whether inside or outside the boundary, and whether they wish to exclude gardens outside the boundary		Policy now revised
Policy 01 Sid Valley Development Principles	Persimmon	Policy 1 Sid valley Development Principles The plan needs to consider whether it is either premature or sufficiently flexible and respondent to the emerging Greater Exeter Plan which will have significant impact on the Regional distribution of housing allocations and requirements. The plan should therefore recognise this emerging document and not only the adopted East Devon Local Plan is highly material. Once adopted the Greater Exeter Plan's housing distribution and special strategy may undermine and conflict with a number of core policies as proposed. The plan needs to be updated now to account for this.		The Plan will be reviewed if Sidmouth is allocated a different housing figure as a result of the Greater Exeter Plan being adopted or changes to the East Devon Local Plan.

		Given the above, Persimmon questions whether the neighbourhood Plan would be better prepared alongside and in conjunction with the emerging Greater Exeter plan so as to directly respond to its strategic direction for housing growth. The Neighbourhood Plan should proactively seek to identify new, suitable, sustainable and achievable housing sites to meet an established housing need of the LPA (and wider Exeter Plan area). The evidence base methodology and sequential testing should form part of this robust and comprehensive process and not be overlooked as is currently proposed. Persimmon questions the purpose of this Neighbourhood Plan if one of the core elements within it, housing, is not being comprehensively addressed or planned for? The effectiveness of the Plan is therefore limited by future housing policy and allocations on a regional/sub-regional level which will conflict with the Neighbourhood Plan level allocation of Green Wedge's and local context policy. Aim number 7 identifies matters of design, construction, scale and massing of new development. The Neighbourhood Plan should not be over-prescriptive and prevent developments from organically being prepared to reflect the context and design requirements of its setting. Where new residential development is to be supported, planning authorities must make best use of development land to optimise development coverage and housing numbers to support the authority's housing need. This should not detract from the need for good design and housing quality.		The NP is required to be in general conformity with the strategic policies in the **adopted** Local Plan. The Greater Exeter Plan is at an early stage and its policies have not been the subject of consultation and has not been tested at examination Sidmouth Town Council will take a positive approach to its consideration of development in its role as a consultee to ensure that it will be balance housing, employment, retail, community, access and leisure development to ensure that the Sid Valley remains an attractive and vibrant place for those that visit or live here. The Town Council and the Local Planning Authority will seek to work with applicants and other stakeholders to encourage the formulation of development proposals that can be approved. Policy 1 supports the requirements of the East Devon Local Plan particularly Strategy 26 and Strategy 27 by providing the guiding principles that will ensure the Sid Valley's contribution in providing new homes, jobs, town centre functions, social and community facilities, infrastructure, the environment and allocated sites. The SVNP brings environmental concerns to the forefront, to ensure that our high quality environment is protected and maintained to meet community and visitor expectations whilst still meeting the housing and employment needs of those who live and work in the area. The NPPF states that neighbourhood plans should develop robust and comprehensive policies that set out

				the quality of development that is expected. This guidance does not prevent contextual design solutions Agreed
Policy 01 Sid Valley Development Principles	Savills	It is considered that draft Policy 01 should include additional flexibility to facilitate the delivery of development outside of BUAB's where such development would be consistent with all other policies in the Plan and represent sustainable development. Whilst there is reference in the policy to a 'positive approach' to development proposals, it is considered that the policy would benefit from increased flexibility to respond to an identified local housing need. If for example, a local housing needs assessment is undertaken for Sidbury, as stressed earlier in these representations, which identifies a need to deliver housing at the village, Policy 01 and the draft Plan as a whole includes no flexibility to respond to this. As a result, we recommend new wording is incorporated into Policy 01 to make it clear that should land which is suitable and sustainable be available to deliver housing to meet an identified need, a positive approach will be taken to facilitate the development of such sites. As already set out in the previous representations attached at Appendix 2, it is considered that the land south of Furzehill, Sidbury, is entirely suitable for residential development which is sensitive to the AONB and capable of delivering development which is commensurate with the size and scale of the village.		Policy1 has now been revised and please refer to include a policy 10B relating to Exception Sites. The Housing Needs Assessment was based on the whole of the Parish not just the town of Sidmouth There is a presumption in the NPPF against major development in AONBs. The residential development of land which lies immediately adjacent to the built-up area boundary and is well related to the pattern of adjacent developments in the vicinity will be allowed if it is specifically provides for the specific housing needs of persons' resident of or connected to the settlements within the plan area. Such developments will be required to include at least 66% affordable housing and all the housing whether market or affordable must be of a type and size required to meet local housing need as set out in Policy 12
	Policies on Built and natural Environment			
Policy 02 Protected Views	Savills	We acknowledge the requirements of draft Policy 02 which states that "Any development must not cause a significant impact on the current views as shown in the 'Strategic Views' Maps provided in the Place Analysis". We agree that development should be sensitive to key views and have reviewed the key 'strategic views' identified in the Draft Plan alongside the evidence presented in the Sid Valley Place Analysis (February 2018). Whilst the development of a number of areas within the key views identified is likely to be challenging, this is a constraint which would not be presented through the development of the Land South of Furzehill, Sidbury. There are two key strategic views outlined within the Place Analysis report, which face towards Sidbury, and on the face of it appear to capture the site. The two		Noted

		views in question are view 1 (Sidbury (Pen Hill) to the sea) and view 4 (Sidford to Sidbury). However, it is clear that from both viewpoints, the site is not visible and is instead entirely hidden from view. To assist in demonstrating that the site is not visible from the identified key strategic views, a document is attached at Appendix 4 which sets out a number of panoramic views surrounding Sidbury. This demonstrates that the site is completely hidden from all views with the exception of views from the east of Sidbury looking towards the village. However, even from these views, the development of the site would sit against a backdrop of development and would be read as 'infill development' given the existing housing on both sides. In relation to the two key strategic views identified, page 5 of the appended document demonstrates that the site is not visible from views from the north. The appended document does not however include the key view from the south (north of Sidford) given that it was considered at the point of preparing this analysis that the site would not be visible from this view. However, in order to further demonstrate this, an individual photograph was taken from Ottery Lane (north of Sidford) looking north, which shows that the site is not visible from this key strategic view as a result of the topography. In summary, there is an opportunity to deliver development on the land south of Furzehill, Sidbury which does not impact on any of the identified key strategic views set out in Policy 02		
Policy 02 Protected Views	Natural England	The map does not seem to include views up from the town and the Byes towards Salcombe Hill although these views are referred to in the text and it is these views outward that are crucial for the character of the valley.		Please see revised policy wording and all views which are detailed in the final NP
Policy 02 Protected Views	EDDC	Policy 02 is considered to be excessively onerous. Who is responsible for checking whether development would be visible from each of the 34 different viewpoints on pages 16 and 16 [sic] of the Place Analysis? A simpler approach with fewer protected views is needed. Policy B2 of the Budleigh Salterton NP might provide a good model. In addition, suggested amendments are shown in red: Any development must not cause a significant adverse impact on the current Views as shown in the 'Strategic Views' Maps provided in the Place Analysis. Except when development will not be visible from the viewpoints,		Please see revised policy and additional images and descriptions in the final NP. There are now images and descriptions of each view to be protected and they are listed separately within the final NP document

		Proposals must demonstrate that they will have a low or negligible impact on the views, in particularly assessing: A. The key views from within the settlements to the surrounding AONB or the Coastal Protection Preservation Areas; and B. Strategic views from outside the BUAB. Regarding B. – Which are the 'key views' and which are the 'strategic views'? Do you have justification to illustrate why some views are more important than others?		
Policy 02 Protected Views	Keith Gillanders	p. 12 Protection of Valued Views Clarify. The map does not seem to include views up from the town and the Byes towards Salcombe Hill and Soldiers Hill, Peak Hill and Core Hill, although these are referred to in the text and it is these views outward that are crucial for the character of the valley.		These are important views that contribute to the character of the Sid Valley. Larger images have been inset into the NP document plus a larger plan of all views has been prepared.
Policy 02 Protected Views	Bloor Homes	Draft Policy 02 requires that any development must not cause a significant impact on views as illustrated on the 'Key Strategic Views' plan, which supports Draft Policy 02. Bloor Homes has fundamental concerns with this Draft Policy. As currently worded the draft policy is too ambiguous and as a result it is unclear how it will be effective and is justified. It is not clear whether the views to be protected are to be restricted to the areas contained within the blue lines illustrated on the 'Key Strategic Views' plan, or whether the protected views will stretch beyond these areas. If this policy is to be retained, a clearer and more detailed plan showing the exact locations of the views and their extent should be included to support the policy, including details of specifically why there is evidence to require strict control over development within or affecting these views. Not only is the Policy ambiguous, it is also considered to be unnecessary. The East Devon Area of Outstanding Natural Beauty (AONB) is defined tightly around the settlement boundary of Sidmouth. Many of the proposed Strategic Views contained within the Draft Policy are therefore already controlled by the existing designation of the AONB, where views into and out of this nationally designated area will be a relevant consideration when planning new development and making decisions in respect of planning applications.		Please see revised Policy 2 which clarifies this issue. Larger individual plans have been incorporated along with photos from each viewpoint? The designation of an AONB does not replicate the need to protect key viewpoints.

		Bloor Homes suggest that this Draft Policy is removed from the Neighbourhood Plan, as it is not clear and is unnecessary – on this basis it fails to meet the basic conditions. Should it still be considered important to retain some of the views within the urban area of Sidmouth, these should be much more specifically defined, and are likely to most appropriately be contained within either the plans supporting text (rather than policies) or as a separate standalone guidance document		
Policy 02 Protected Views	Persimmon	Objection. The key strategic view plan is not clear. It is not large enough and there is no articulation as to why these views in particular have been chosen or considered most important. Until better defined the Company can make no further comment on this.		Agreed –larger plans have been inserted into the Submission version of the plan
Policy 02 Protected Views	East Devon ANOB	Built and Natural Environment The text on page 11 refers to a 'Coastal Protection Area' and 'Coastal Preservation Area'. Clarification is required about the nature of, and justification for, these areas and they should be shown clearly on a plan. If you are referring to an area already designated in another document (e.g. Heritage Coast or Coastal Preservation Area identified in the East Devon Local Plan (EDLP)) this should be explained and a reference to that other document provided. Reference is also made to a 'built up area boundary' (BUAB). Clarification is sought on whether it is the intention to define this boundary within the neighbourhood plan or whether it is defined in the Neighbourhood Plan it should bet shown clearly on a map.		All references will be to the Coastal Protection Area as designated in the Local Plan.
Policy 02 Protected Views	SVA	Where is the evidence? The plan is meaningless, where are the views to & from in detail, perhaps a grid reference? "Strategic Views" must have more detail about their lines of sight and what interference will be permitted. A developer will be able to run rings around this as stated in this wording. Surely Salcombe Regis has some strategic views?		Noted
Policy 03 Settlement Coalescence and Green Wedges	Persimmon	Objection. The Green Wedges and Corridors plan is extremely hard to understand. It is not big enough and the plan is poorly laid out and annotated. There are no streets or areas identified or referenced. Until better defined and further detail added no further commentary can be added.		Agreed – a larger scale plan has been produced with a clearer base plan to allow sites to be identified. Please see additional maps and explanations. **Noted**

		The Green Wedge surrounds the vast majority of Sidmouth and in doing so sterilises any form of future green-field development through a presumption against any built development as contained within this policy. If such a policy is to be proposed it must be justified, evidenced and articulated in detail. It must also be accompanied by a comprehensive plan for new housing allocations to meet both Sidmouth and the wider Local Plan/ Housing Area. Again, this must be robustly tested. Without the allocation of land to meet the housing need and it planned for and allocated within the Plan, this Green Wedge policy appears to sterilise and restrict any opportunities for the Plan to respond appropriately in due course to meeting its wider housing requirements. Persimmon objects to the lack of detail on future housing numbers and allocations which are missing in any form in this Plan. The company cannot ascertain whether its land interests are within the proposed Green Wedge or not. Until such time as the housing requirements are known and planned for, a sustainable, purposeful Green Wedge policy cannot be determined.		Maps need to be in the NP itself and not just referenced to the PA – all now included in the submission version. Agreed, please see policy on Exception Sites
Policy 03 Settlement Coalescence and Green Wedges	Natural England comment	Policy 03 sets out a presumption against development within green wedges and corridors. However the accompanying map shows areas in 3 different shades of green, some of which include areas which are already developed. In addition, the green areas appear to 'end' at the page edge rather than being contained within a clear boundary on a plan. We welcome the Plan's commitment to enhancing the natural environment within & surrounding Sidmouth but if the plan is to designate such areas they need to be justified and shown clearly on an Ordnance Survey base in order that they can be used effectively in decision making. If these areas are already designated in another document (e.g. the East Devon Local Plan) this should be explained in the Plan text. We suggest that this issue is discussed with East Devon District Council.		Agreed – the map is not helpful – it has been replaced. Clearer maps have been sourced and definitive justifications. Policy now re written, based on evidence as follows; **Sid Valley Consultation** Evidence taken from wide engagement with the residents of the Sid Valley highlight that the green spaces throughout the Sid Valley add to its character and unique identity. Specifically, encroachment into the green wedges, including Public Open Space or land recognised as a public amenity, will not be supported. **Sid Valley Place Analysis** "Landscape is a key issue, not least because the Plan area is set entirely within the nationally designated landscape of the

				East Devon AONB. The AONB designation washes over the smaller settlements in the NP area and directly abuts the 'Built Up Areas' boundary of Sidmouth (3.1.0 Wider landscape CONTEXT AND AONB); Development …must be compatible with national policy and the AONB Management Plan." "Have Your Say" Workshop at Kennaway House, (2.2.0 THEME: Our Built Environment; 2.3.0 THEME: Our Natural Environment) The Sid Valley lies almost entirely within an AONB area, this policy adds further weight to the policies in EDDC Local Plan.
Policy 03 Settlement Coalescence and Green Wedges	EDDC comments	Does the 'presumption against any built development' discourage alterations or extensions to existing buildings within the green wedges? Does it discourage development that would be ancillary to the green space, such as equipment sheds? What policy tests would such development need to satisfy in order to be acceptable? Strategy 8 of the Local Plan may be a good model, depending on the objective of the policy.		See revised policy wording
Policy 03 Settlement Coalescence and Green Wedges	Keith Gillanders	p. 13 Settlement Coalescence and Green Wedges. Clarify and strengthen. The map has four shades of green, with no key to explain the significance of each. All land adjacent to the river should be protected from development; the map appears to leave open for development two small areas to the east of the river.		Agreed
Policy 03 Settlement Coalescence and Green Wedges	Bloor Homes comments	Draft Policy 03 states that "there will be a presumption against any built development within the areas shown in the 'Green Wedges' diagram" displayed on page 13 of the draft plan. Aside from general references to the policy context contained within the NPPF and East Devon Local Plan ["EDLP"] no specific reasoned justification for this policy has been provided. However, it is assumed that the purpose of the policy is to reduce ribbon development and settlement coalescence. The supporting map to Policy 03 demonstrates that nearly all land surrounding Sidmouth is to be designated as being within a 'Green Wedge', i.e. there has been a blanket approach to this proposed designation. The plan is also unclear and ambiguous about which areas are covered by which designations, and the relevant boundaries of each.		See revised policy with justification from Local Plan Strategy 8 Development in Green Wedges Agreed

		It is not clear what specific technical evidence has been prepared to support and justify the Green Wedge policy that is being suggested. The evidence-based justification for such a policy is critical. All evidence to support and justify the Neighbourhood Plan should be made available for robustness and transparency, as without such justification a restrictive policy such as a Green Wedge will not meet the basic conditions for a Neighbourhood Plan policy. Those national policies that are referenced within the plan are also mainly relevant to the designation of spaces as Local Green Space ["LGS"] which is a specific and highly restrictive designation for land, and which is plainly not what is intended by the plan, where the areas identified could not reasonably be concluded to represent anything other than extensive tracts of land. In the context that East Devon and Exeter, Mid Devon and Teignbridge local authorities are in the process of preparing the Greater Exeter Strategic Plan (GESP), the Sid Valley Neighbourhood Plan should not be setting policies that overly restrict future development within Sidmouth. Although the GESP is only at the initial stages of preparation, with a Draft version proposed for consultation at some point this year; upon adoption the document will set the housing needs for East Devon. Sites that can accommodate new residential development and help to meet future housing requirements to be identified within the future GESP, should not be unduly restricted from coming forward by draft policies such as Policy 03 of the draft Sid Valley Neighbourhood Plan. This is a particularly pertinent issue when the findings of the Housing Needs Assessment (HNA) for Sidmouth are considered. The HNA provides some of the background evidence to the Draft Neighbourhood Plan and is referenced in support of Policy 11 (Affordable Housing). Notwithstanding this, Paragraph 15 of the HNA confirms that the 150 additional dwellings for Sidmouth over the period 2013-2031, as required by the Local Plan are insufficient to meet local needs. The HNA continues to confirm the following: • "affordable housing needs are unlikely to be met by supply as a proportion of the future need will be for specialised housing and there is a fundamental mismatch between the profile of the affordable stock and the profile of households on the register; • the supply of re-sale housing, is unlikely to be affordable to first time buyers and first time movers and a significant proportion will be bought by incomers; • the population of East Devon District between 2014 and 2039 is estimated to grow by 24,383 people – an increase of 18%.		See revised policy We refer in 03 and 05 - which is the justification for the policies. The flood zones are vital eco- corridors so the flood zone maps indicate where the eco corridors are located. This plan is based on the adopted local plan not an emerging plan that is in its early stages. See revised policies

		However, the growth is not projected to be uniform across the age groups. The number of children under 15 years of age are projected to grow by 11% and those aged 65 and over will grow by over 24,000 people – an 81% increase. Sidmouth will bear a disproportionate increase in its older population as it is an attractive location for people to retire to Sidmouth's market housing is not affordable to low income groups meaning that many who are in unsuitable housing will have no option but to seek affordable housing or private rented sector homes and claim housing benefit." The HNA also confirms that when the Objective Assessment of Need (OAN) for Sidmouth is simplistically calculated, this produces a net additional requirement of 60-90 dwellings per annum. Taking the midpoint of 75 additional dwellings per annum, this would create a total requirement of 1,350 additional dwellings over the East Devon Local Plan period of 2013-2031. On this basis, future development sites that are located adjacent to the existing settlement boundary within Sidmouth and which can adequately accommodate future residential development should not be precluded from coming forward by overly restrictive policies such as Draft Policy 03 (and others). It is therefore suggested that in order to meet the basic conditions of adopting a Neighbourhood Plan this policy should be deleted or substantially amended.		
Policy 04 Green (wildlife) corridors	Natural England	Natural England comment. We welcome the policy giving protection to named Green Corridors within the Plan area. However, these areas need to be shown clearly in the plan on a map base and supported by appropriate evidence to ensure they are used effectively in decision making.		Agreed - We have revised policies and supporting maps accordingly.
	EDDC	'Any development must not cause a detrimental impact on the areas as shown as Green Corridors in the maps provided in the Place Analysis.' Suggest the impact is outlined. Detrimental in what way? Detrimental to wildlife? What is this policy seeking to protect? Mitigation/compensation may be an acceptable way to overcome harm. Any maps should be included in the Plan rather than referenced. The map in the Place Analysis is not clear, the three areas should be labelled.		This policy has now been revised.
Policy 4	SVA	What is "settlement coalescence"? What is a "Settlement"? How do Green Wedges relate to the AONB? And the Coastal Preservation areas?		Policy 4 has now been revised

		The diagram is meaningless. A Green Wedge" is an inviolable space between built up areas. eg Sidford and Sidbury. How are "green spaces "different" from "Green wedges" This policy is very important and the policy is badly stated currently Policy 04 How can there be a green corridor along the Sid between Port Royal & Eastern Town? Surely the River Sid Valley between the Toll House to Sidford Village Hall is a better wording than The Byes to Sidford? The policy needs an accompanying Plan as it's meaningless as it is.		
Policy 05 Local Green Space Designation	Natural England	We welcome the designation of 'Local Green Space' within the Neighbourhood Plan. However, to ensure these areas are taken into account at the decision-making stage it is important that they are shown clearly on a map within the Neighbourhood plan and supported by an appropriate evidence base. 'Local Green Space' designations will also need to meet the criteria set out in the National Planning Policy Framework (NPPF) paras 76 & 77. If the Neighbourhood Plan is referring to Local Green Space already designated in another document (e.g. the East Devon Local plan) this should be made clear in the text.		This has been done along with a list of Local Green Spaces which is included in the plan.
Policy 05 Local Green Space Designation	EDDC	The map, or a list of the spaces, should be included in the NP for ease of reference. The two links in the Appendix go to a map with no title or key and a list of spaces with no title. Nowhere are these sites given the designation of Local Green Space. With no land formally designated, this policy is not deliverable. It is unclear if this policy overlaps with policies 03 and 04 Is ancillary development acceptable, such as sports pavilions? What are the criteria?		Agreed We have caveated the policy " except in exceptional circumstances' as per the NPPF
Policy 06	EDDC	Suggested amendments: 'Development should be designed so as not to significantly, adversely impact on the amenities of its neighbours and should seek to protect any existing		Please note this is now Policy 7 Noted

Infill Development and Extensions		trees that contribute to the overall amenity of the area as well as being appropriately landscaped.' 'Out of town centre' (Where is the boundary of the town centre? Differing opinions will lead to conflict between interested parties/decision makers. How should Sidford and Sidbury be treated?) 'development will be expected to provide for sufficient off-street car parking both for occupiers and visitors in line with adopted standards.' (Specify those adopted standards you are referring to - Does Local Plan policy TC9 provide for the level of parking you require? Or do you mean another standard?) 'Development should seek to create safe and accessible environments which seek to design out opportunities for crime and anti-social behaviour.'		Sidford and Sidbury would be treated as out of town centre Agreed – amend to EDDC car parking standards
Policy 06 Infill Development and Extensions	Keith Gillanders	p. 16 Infill development and extensions. Strengthen. The wording needs to be strengthened, along the lines of "Infill development and extensions will only be permitted where they do not adversely impact on the amenities of neighbouring properties or the overall amenity of the area."		See revised policy
Policy 07 Local Distinctiveness	EDDC	States 'Building heights should not normally be higher than neighbouring properties' - much of Sidmouth is built on sloping land, so it's normal for one house to be on a higher/lower level than its neighbour. The emphasis should be placed on the development sitting well in the street scene, maybe the policy could be re-worded?		Policy now re written and reference made to sloping land issues
Policy 7	SVA	The place Analysis refers to Design qualities not Design Guidance. Where is the justification for the building heights? The character analysis sketch is meaningless here.		Noted
Policy 08 Light Pollution	EDDC	'There will be a general presumption against all outdoor lighting (both ambient and floodlight) outside the settlement areas,' (Do you mean the		Agreed that it should be Built up area boundaries

		Built-up Area Boundary? If other, we suggest mapping the areas) 'unless there is overwhelming operational requirement and the illumination has been designed to minimise light spillage and is restricted as to hours of usage.		
Policy 08 Light Pollution	SVA	The specifics of this policy are unenforceable. Any development might operate 24 hours a day, and even if not there will need to be light, both safety & security all night.		Noted
Policy 09 Energy Efficiency	EDDC	'Low Carbon Buildings: To meet statutory climate change obligations each development will have to demonstrate an efficient use of resources and energy over the life of the building.' (This seems onerous for all but the biggest developments. Building Regs should be adequate.) 'New buildings and extensions should meet the latest sustainability standards, such as the environmental assessment BREEAM.' P21, Aim 4 Suggested additional text: 4. If planning permission for any new builds is granted, then there should be a requirement for an element of social housing to be included in that development. Requests for developments that are wholly social housing will be supported, subject to the environmental policies. P21, Aim 6 'Exceptional housing schemes such as self-build and cohousing are welcomed but only where they demonstrate excellence in design or sustainability and promote the opportunity for community based solutions to meeting housing need. These are welcomed within the BUAB but will need careful examination outside the BUAB.' 'Careful examination' is vague and doesn't indicate the Plan's intention. Are you allowing exception housing for self-build and/or co-housing outside of the BUAB? If you are, what are the criteria?		This has now become CA BN07
	Community Actions Built and Natural Environment			
BN03 Retain the Tree canopy	Keith Gillanders	p20 Community action BN03' Retain the tree canopy'. Qualify. We fully support retaining the existing tree canopy and planting new trees where appropriate. However, recently there has been some inappropriate tree planting in the Byes, which risks destroying the parkland character of the area by overplanting. There is a balance to be struck between trees and sunny grassed areas.		Noted –
	Policies on Housing			

Policy 10 Housing Sites	EDDC	Proposed sites for new housing development in the Sid Valley (as defined by the East Devon Local Plan), will be required to meet the following criteria: • Be to a scale that is appropriate to the site and meets the characteristics of its location as set out in the Place Analysis, 2017. • Provide through the payment of the Community Infrastructure Levy, adequate infrastructure, based on impact on community facilities, schools, doctors and on sewerage, bus services and highways. • If inside the BUAB, be restricted to brownfield sites.' (Too restrictive. Some greenfield sites are acceptable, as demonstrated by the Town Council's support for a dwelling in the garden of Rockshaw (17/2890/FUL). Restricting development to brownfield sites would mean that the contribution of dwellings in Sidmouth would be severely limited, restricted to garage sites and redevelopment of existing properties. This may restrict the ability for Sidmouth to meet the stated target of 50 homes on windfall completions in Strategy 26 of the EDLP. As it is, the policy conflicts with the Local Plan because it allows for less development.) • If outside the BUAB, be limited to replacement dwellings, exception sites and housing for rural workers as covered by Policy H4 of the EDLP. Define what an exception site is for the purpose of the Plan – is it the same as Strategy 35 of the EDLP?		Please revised Housing Policies 10A and 10 B We will define exception sites based on but not copying Strategy 35 of The Local Plan
Policy 10 Housing Sites	Bloor Homes	Draft Policy 10 confirms that new sites for housing development located outside of the Built up Area Boundary (BUAB) in Sidmouth must be "limited to replacement dwellings, exception sites and housing for rural workers". As confirmed above in respect of comments made to Policy 03, the Neighbourhood Plan should not unduly restrict future residential development coming forward on land that could meet future housing needs within the emerging GESP, as if this is the case then such policies would either fail to meet the basic conditions or become out of date soon after any adoption once future development requirements have been confirmed. This is considered to be a particular issue given the findings of the HNA regarding the insufficient supply of housing to meet local needs in Sidmouth as discussed above in respect of Policy 03. In this regard, the Government's Planning Practice Guidance (PPG) confirms that: "Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area.		See new housing policies specifically relating to Exception Sites This neighbourhood plan has been prepared in the context of a recently adopted local plan and not an emerging local plan.

		They can be developed before or at the same time as the local planning authority is producing its Local Plan. A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be 4 relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up to- date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development. Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in: • the emerging neighbourhood plan • the emerging Local Plan • the adopted development plan with appropriate regard to national policy and guidance. The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination. The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan" (Paragraph: 009, Reference ID: 41-009-20160211) The current drafting of Policy 10 would be unduly restrict and frustrate the future residential development of land outside the BUAB of Sidmouth, and is		

		therefore likely to generate conflict with the future development plan for the area. The current drafting of the neighbourhood Plan is unlikely to meet the basic conditions required for the plan to be put to referendum and to be made on this basis. In accordance with the PPG, the Neighbourhood Plan Group should produce evidence to demonstrate how they have engaged with the local planning authorities preparing the GESP, to ensure that there will be no conflicts between the two policy documents. If no evidence of such cooperation is available, it is suggested that Policy 10 is amended as below: "Proposed sites for new housing development in the Sid Valley (as defined by the East Devon Local Plan), will be required to meet the following criteria: • Be to a scale that is appropriate to the site and meets the characteristics of its location as set out in the Place Analysis, 2017. • Provide through the payment of the Community Infrastructure Levy, adequate infrastructure, based on impact on community facilities, schools, doctors and on sewerage, bus services and highways. • If inside the BUAB, be restricted to brownfield sites. • If outside the BUAB, be limited to replacement dwellings, exception sites and housing for rural workers as covered by Policy h4 of the EDLP.		The plan will be revised if additional housing land is required to respond to a future adopted local plan.
Policy 10 Housing Sites	Richard Heard	Greater flexibility required on brown field sites which may not be contained within BUAG. Rigid policies are likely to deter landowners from bringing forward sites. Fixed affordable housing numbers do not take into account existing use/valuation and viability issues which need to be set against affordable housing percentages. Restrictive planning policies will cause demand to exceed supply and lead to a gradual rise in prices.		The policy has been amended to allow for viability issues to be considered.
Policy 10 Housing Sites	Savills	In accordance with comments made earlier in these representations and for Policy 01 above, it is considered that Policy 10 should include flexibility to respond to an identified local housing need, and that wording should be incorporated to make it clear that should land which is suitable and sustainable be available to deliver housing to meet an identified need, a positive approach will be taken to facilitate the development of such sites. Currently Policy 10 restricts development to sites within the BUAB and on brownfield sites, however there are currently no sites identified for Sidbury on the District Council's brownfield register. It is therefore unrealistic to expect development within Sidbury itself and alternatives outside of the		Noted. Please see revised Housing policies specifically relating to Exception Sites

		village must be explored. Should there be a shift in housing land supply or should a specific housing need be identified for Sidbury, the Plan must be flexible to respond to these changes and to plan positively to avoid speculative planning applications in the future.		
Policy 10 Housing Sites	Persimmon	The introduction provides reference to an established housing need. It does not, however, quantify what this housing need is and therefore follow through with a plan to allocate land proactively to respond to this known need. The Plan needs to ensure that it is supportive and complementary to the East Devon Local Plan's housing requirements as well as response to the emerging Greater Exeter Plan. There is no spatial strategy or allocation strategy proposed or direction for new housing. The plan fails to sustainably plan for future housing growth of any sort. Aim number 3. Objection. There is a presumption that development within the AONB will be refused unless a sequential based assessment of all the alternatives has been completed. The plan should itself take steps to assess the availability of brown-field sites to meet its housing need and then proactively plan and allocate land for development where applicable within the AONB. The purpose of a Neighbourhood Plan is for the community to determine where (in the event there is the established housing need to do so) new development should be planned. The Plan fails to do this.		Refer to our revised Housing Policies
Policy 10	SVA	This is basically a restatement of Local Plan policies, do you need it?		Noted
Policy 11 Affordable Housing	EDDC	On schemes of eleven units or more and between six to ten if in the AONB, a minimum of 50% of homes must be affordable which will include:' 1. The Planning Practice Guidance does not allow policies to require on-site affordable housing on developments of 6-10 dwellings in rural areas. The policy should seek a commuted sum in that case. See https://www.gov.uk/guidance/planning-obligations , paragraph 031 and 017 2. EDDC have chosen not to apply the lower threshold across the whole AONB - we only apply it to rural wards. Sidmouth Urban and Rural wards are classed as 'urban' for these purposes and therefore we only require affordable housing on developments of 11 or more dwellings across the NP area.		Revised Policy wording has been included in the final version. On schemes of 11 units or more**, (apart from exception sites as allowed by Policy 10b)** a minimum of 50% of homes must be affordable which will include: a) 70% social or affordable rented accommodation, all of which is to be tenure blind and "pepper potted" throughout the development **b)** 30% intermediate or other affordable housing, for example shared ownership or shared equity, all of

		The NP policy would apply a lower threshold than the Local Plan to developments inside the BUAB for Sidbury and to the areas within the Sidmouth boundary that are in the AONB. For our current approach, see https://eastdevon.gov.uk/planning/planning-services/planningdevelopment-management/unilateral-undertakings-section-106-agreements-habitat-mitigation-and-affordable-housingcontributions/commuted-sum-calculator-stage-1a/ Although the NP approach (applying a lower threshold in the AONB) would be different to our approach, it would be consistent with Strategy 34 in the Local Plan and the PPG. I merely raise it to highlight that there is a difference. I would also point out that Sidbury is the only village with a BUAB in the district where we don't currently apply the lower (6-10 dwellings) threshold. Given that, and the high land values in the area, the NP approach is probably justified (subject to amending it to seek a financial contribution rather than on-site provision on developments of 6-10 dwellings). Policy 11 would benefit from some additional text to allow development to come forward where affordable thresholds are reduced subject to viability.		which is to be tenure blind and "pepper potted" throughout the development. On sites in the AONB schemes of between 6 and 10 units a financial contribution equivalent to a 50% site affordable housing provision will be expected to be made in lieu of on-site provision of affordable housing.
Policy11	SVA	This is totally altruistic and will prevent development		Noted
Policy 11 Affordable Housing	Bloor Homes	We support the essence of Policy 11, however to ensure compliance with the PPG the policy needs to provide flexibility and take into account site specific circumstances. All residential development sites should be considered on their own individual merits and there may be occasions where site viability restricts the amount of affordable housing that can be feasibly accommodated on the site. Strategy 34 of the East Devon Local Plan 2013 to 2031 confirms that in coastal and rural areas, such as Sidmouth, 50% of dwellings shall be affordable. Notwithstanding this, Strategy 34 also confirms that this is subject to viability considerations. The affordable housing approach taken in the Neighbourhood Plan should be consistent with the Local Plan.		Policy now amended to include new Exception sites policy.

		To allow for flexibility, it is suggested that Policy 11 is amended as follows: On schemes of eleven units or more and between six to ten if in the AONB, subject to viability considerations a minimum of 50% of homes must be affordable which will include: • 70% social or affordable rented accommodation, all of which is to be tenure blind and 'pepper potted' throughout the development; and • 30% intermediate or other affordable housing, for example shared ownership or shared equity, all of which is to be tenure blind and 'pepper potted' throughout the development.		
Policy 11 Affordable Housing	Savills	It is acknowledged that Policy 11, which requires the delivery of 50% affordable housing as part of development proposals, is consistent with adopted Local Plan Strategy 34. However, despite including this policy to seek a high proportion of affordable housing to meet a significant need confirmed through the supporting Sidmouth Housing Needs Assessment, the draft Plan makes no strategy for delivering affordable housing at Sidbury. As already set out earlier in these representations, there is a lack of suitable deliverable sites at Sidbury to accommodate future development. It is therefore unrealistic to expect any meaningful amount of affordable housing to be delivered within Sidbury itself and alternative sites outside of the village should be explored to avoid the local need increasing further. The Land South of Furzehill represents a significant opportunity to deliver residential development including a policy compliant proportion of affordable housing which would greatly assist in meeting the significant affordable housing need in the area. Without the development of the Land South of Furzehill, the delivery of much needed affordable housing will not materialise. Therefore, it is crucial that the Neighbourhood Plan Steering Group review the visions and objections and set a clear strategy for Sidbury, including planning for appropriate development to ensure the affordable housing need can be addressed.		Noted. Please see revised Housing Policies 10a and 10b
Policy 11 Affordable Housing	Richard Heard	The fixed 50% contribution of affordable housing on exceptional sites requires flexibility and should be an aspiration not a rigid requirement. There will be brown field sites adjacent or out with the BUAG having existing use which will offset value and affordable housing quota – needs to have regard to viability analysis		Noted

Policy 11 Affordable Housing	Persimmon	Objection. The East Devon Local Plan requires 25% afforable housing. The Neighbourhood Plan seeks to substantially deviate from the tested, viable provision of affordable housing in both the total amount sort and its tenure. The requirement is onerous and inconsistent with adopted policy. It fundamentally impacts the viability of future development without an up-to-date evidence base or viability testing. The implications of this new draft policy are likely to restrict the immediate delivery of housing. This conflicts with East Devon DC's housing delivery requirements and the need to maintain an up-to-date housing land supply.		Incorrect – the figure is 50% Policy wording updated.
Policy 12 Housing Numbers and Bedrooms	EDDC	The percentage of one, two, three and four bedrooms homes on any development shall be as follows: (This wording is too rigid. Strategy 34 of the Local Plan uses the word 'target'.) Market housing: • One and two bedroom homes = 60% • Three and four bedroom homes = 40% • Intermediate housing for sale: (Needs to be a heading) • One-bedroom = 50% • Two-bedroom = 40% • Three-bedroom homes = 10% Are flats acceptable under this policy? Has the policy been tested for viability? Would this policy have the unintended consequence of promoting small and cramped units with little or no outdoor amenity space? If developers make a smaller profit on 1&2 bed units then they may want to squeeze more in.		Figures are based on the Housing Needs Survey commissioned by the Steering Group and the evidence in the NPPF and the SHMA.
Policy 12 Housing Numbers and Bedrooms	John Labrum	Whilst there is clearly a need for affordable housing, it may be a mistake to base a housing policy on the number of bedrooms in the property, without also taking account of the square footage of the property. It seems that bedrooms in modern-build houses can be relatively small – a SVNP policy that specifies a majority of one and two bedroom homes may not achieve a good result		Most neighbourhood plans refer to bedrooms as that is the basis on which planning applications are submitted.

		for occupiers of those homes if it turns out that there is minimal space in the bedrooms to locate a wardrobe etc. Perhaps the policy should specify a minimum square footage for a one bedroom home, two bedroom home etc. It seems that garden space can be very small on modern-build houses, so should there also be a minimum square footage for garden space for houses, to give a safe area for children to play etc? The impression is that modern day houses are allowed to be built, in some cases, ever closer together. Is it really a good environment for people if space within the house is also at a minimum? I am aware of a document 'Technical Housing Standards – nationally described space standard' on the internet – dated 2015. However, I do not know whether these are mandatory standards. It may be that EDDC would need to adopt the standards in the Local Plan in order for them to become mandatory in this area. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard__Final_Web_Version.pdf If appropriate, I wonder whether the requirements set out in this standard might be a basis or guide for minimum square footage requirements to be incorporated in the SVNP. It may be a mistake to base a housing policy on number of bedrooms, square forage should be taken account of as modern built houses can be relatively small. The current SVNP policy may not achieve a good result if there is minimal pace for the occupiers. Suggestion is to base the policy on minimum square footage for a one bedroom, two- bedroom home. There should also be minimum square footage garden space. Can the minimum square footage not be applied as in the Technical Housing Standards 2015 be adopted by EDDC? https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachme		Neighbourhood plans cannot introduce minimum room or house sizes. It can only be introduced by a Local Plan policy.

		nt_data/file/524531/160519_Nationally_Described_Space_Standard__ __Final_Web_vers ion.pdf		
Policy 12 Housing Numbers and Bedrooms	Keith Gillanders	p26 ' strategic housing markets assessment'. Clarify. There appears to be a line or more missing in the first sentence of the last paragraph- it does not make sense.		Agreed –updated in the submission version
Policy 12 Housing Numbers and Bedrooms	Persimmon	Objection. The Policy seeks to prescribe the development mix of all new sites, not only in the affordable housing mix but also market housing type. This is too prescriptive and fails to allow for market conditions to dictate the saleability and mix of the market properties. The introduction of such policy is inconsistent with government policy and fails to allow developers to consider the context and setting of a specific site and therefore the appropriate form of development, housing type and mix to be provided.		It is appropriate for the plan to attempt to meet the housing needs of the plan area.
Policy 12	SVA	What is intermediate housing? Evidence lacking		Noted
Policy 13 Local Connections	EDDC	'the eligibility for affordable housing will be administered by East Devon District Council as the…' (TYPO)		Noted
Policy 13	SVA	EDDC defines eligibility for their own **social** housing not affordable housing, which can be private. How does the applicant demonstrate a local connection? And what is that connection? That the applicant has an aunt who lives in the Valley? What relevance is the photo?		Noted
Policy 14 Principle Residency	EDDC	Does this policy need to say how properties would be restricted? For example, by condition or S106 agreement. Presumably the policy is intended to apply to the conversion of buildings and existing dwellings to flats? However, if an application for conversion of a building to holiday lets came in (i.e. restricted dwellings), we would not be able to apply this policy because the development would not be for open market housing. Moreover, Local Plan policy E16 supports such		wording amended to refer to a Section 106 agreement

		development. In this way, therefore, new holiday accommodation, including 'second homes' can still be provided in spite of the policy.		
Policy 14 Principle Residency	Keith Gillanders	P 28 Policy 14: Principal Residency. Strengthen. Is there any legal basis for strengthening this policy, to restrict new market housing to people with a local connection? This would have to apply also to subsequent sale, and also prevent use as a holiday let.		There is no evidential basis in this area to justify local occupancy restrictions.
Policy 14 Principle Residency	Persimmon	Objection. The restriction that all new homes to be the principal residence is again overly prescriptive and objected to. The Plan should allow for open market conditions to prevail to ensure the ready delivery of housing.		Disagree -This policy is based on the housing needs of the area
Policy 14	SVA	Is this the St Ives wording? The justification is that the public overwhelmingly agreed with the statement. Surely this is leading them, asking their opinion,		Noted
	Policies on Access and Connectivity			

Policy 15 Park and Ride	Bloor Homes	We are generally supportive of proposals for a park and ride scheme on the outskirts of the settlement of Sidmouth. As evidenced within the supporting text to policy 15, a scheme of this nature has previously received support from local residents. It is recognised that a scheme of this nature could have beneficial implications in reducing visitor traffic congestion within the settlement. Capacity testing should, however, be undertaken to ascertain the suitable size of a facility to ensure that it meets the required capacity needs without under-utilising the proposed site. A suitable park and ride scheme located within the outskirts of Sidmouth could be supported via contributions from the Bloor Homes proposal on the land at Sidford High St, Sidmouth and/or the provision of land and facilities as part of a wider mixed-use development. Bloor Homes is willing to enter into discussions with Sidmouth Town Council regarding the possibility of bringing this forward.		Noted
Policy 15 Park and Ride	Richard Heard	Wellbeing of town centre dependent on retention/new extension of town centre parking with incentive parking costs		Noted
Policy 16 deleted		Deleted after discussion at NP meeting		Policy deleted
Policy 17 Shared use of paths	Keith Gillanders	'Encourage greater priority to be given to pedestrians and cyclists in parts of the town centre to improve safety and enjoyment of the town'. More detail required on implementation. Just what is ' the community' supposed to do about this? It requires action by the appropriate authority (Devon County Council? EDDC?) to divert traffic from the town centre and manage essential traffic so that pedestrians and cyclists have priority. Some existing roads e.g. New Street and Church Street could be pedestrianised or semi-pedestrianised with much clearer signage that pedestrians have priority, and possibly limiting vehicles to deliveries and residents needing to use the road for access to their dwellings, along the lines of the permit holders only traffic zones in		The policy can only relate to new development

		many Italian town centres. An overall 20mph speed limit should be imposed throughout the town centre. p 30, Access and Connectivity, aim 3. Skateboarding on pavements is illegal in the UK, and impractical and dangerous on Sidmouth's narrow roads. Trying to accommodate this mode of transport, used in Sidmouth by a tiny minority, risks diverting attention from the much more pressing issues of congestion, and conflict between pedestrians, cyclists and vehicles. The policies on access need strengthening; they are particularly weak although this is a pressing issue for residents. 78% of respondents to the survey support pedestrians and cyclists being given greater priority in the town centre. Where is this reflected in policy?		
Community Action AC02 Town Centre	Keith Gillanders	See comments by Keith Gillanders above		Noted
Community Action AC03 Sidbury to Sidford pathway	Savills	Community Action AC 03: Sidbury to Sidford Pathway Whilst not a specific draft policy, it is noted that the Draft Plan includes a number of 'community actions' on page 34 of the Plan, including an aspiration to deliver the Sidbury to Sidford Pathway (Community Action AC 03). This will "Give support to a shared pathway for pedestrians and cyclists from Sidbury to Sidford, which will cross the tiger crossing in Sidford and link with the Byes". The opportunity to deliver this desirable link and the benefits it would bring are supported, however it is considered that the delivery of such a link is unlikely without development funding. The development of the Land South of Furzehill has the potential to contribute towards the funding of this important link. In addition, there is a significant opportunity to deliver a section of this pathway through the Land South of Furzehill, thereby avoiding the need to April 2018 negotiate a very narrow section of the A375 (Chapel Street). We would welcome the opportunity to discuss this further.		Noted
Community Action AC05	John Labrum	Consideration might be given to use of the track-bed of the old railway line from the A3052 to the former Sidmouth Railway station as a tramway, or		Noted

Old Railway Line		tourist steam railway, to form part of a novel means of transport from a park and ride facility near to the A3052 to the old Railway station. The tramway or tourist steam railway would potentially be an attraction in its own right, adding to Sidmouth's visitor appeal, whilst also performing a function as part of a park and ride facility. Clearly, there would need to be – • A suitable place for a car park near to the A3052 and accessible from the route of the old railway; • A means of trams/trains going round the housing apparently built on the old railway, near to the station; • Agreement would be needed to use the old railway station; • A shuttle bus service from the station to the sea-front – this could again be something of character, eg vintage buses, open-top buses. This point also clearly relates to Policy 15 in the SVNP – Park and Ride		Ideas outside the scope of the NP
Community Action AC05 Old Railway Line	Richard Eley	Richard Eley Dear All, I write with regard to the proposal to create a cycleway linking Sidmouth to Feniton. Having read the latest of a number of studies conducted into this route, I am increasingly convinced that the purpose of the route is questionable, and the currently favoured option via the old railway line north of Sidmouth may not be the best one. It is not clear how the idea of linking Sidmouth to Feniton came about, but it would seem that the existence of the former railway line is the explanation. There are few economic or social justifications for a complex 15 mile route linking only 26,000 residents, more than half of whom are in Sidmouth itself. Tourism is a vital component of the proposal. Whilst it is true that access to a main line station is beneficial, the number of cyclists using the railways remains relatively low. The route from Feniton to Sidmouth is attractive and relatively flat, but there are few opportunities for refreshment. A cycle link to Exmouth via Budleigh Salterton would link the three coastal communities, as well as the villages of Newton Poppleford/Harpford and Otterton. A combined population of around 60,000.		Noted Ideas outside the scope of the NP

		The three towns all have significant tourism economies and accommodation availability. The economic benefits of this route would surely greatly exceed the Sidmuth to Feniton route. A Sidmouth-Exmouth route would be very scenic offering valley and coastal views. Such a link would also connect potentially with the riverside route linking Exmouth to Exeter, thus creating an exceptionally attractive cycle route from Exeter to Sidmouth. At first glance, it would seem that a Sidmouth-Exmouth route would be more easily deliverable. It would not require a crossing of the A3052, and would appear to involve fewer landowners. My understanding is that Clinton Devon Estates own most of the farmland in the Otter Valley. Once again, a former railway line could be used. A possible route using green lanes is available: this route was considered by the most recent study as Option B, but a route via Woolbrook was preferred. I would suggest that Option B is pursued for a number of reasons: firstly, and probably most importantly, it avoids the very complex problems associated with creating a functioning and safe cycle route through Woolbrook to connect with The Byes. Secondly, the use of green lanes means the avoiding of costly and difficult negotiations with landowners. Option B is much easier all round, with wider, less busy roads in the Bickwell Valley area, and is much more scenic. The only negative feature is that the route is more hilly. In my view, this is a small price to pay for a much nicer route in every other respect. Option B proceeds via Higher Greenway Lane to Bowd, where the route to Feniton requires the A3052 to be crossed. However, to get to Budleigh/Exmouth, this is not necessary. Higher Greenway Lane continues westward beyond Bowd and parallel with the A3052 to the top of Four Elms Hill. From there it descends to Northmostown, again using a wide green lane. At Northmostown it joins the unclassified road that serves Northmostown and a number of farms on the east side of the Otter Valley.		

		The former railway line in the Otter Valley runs to the west of the river, and so the river needs to be crossed The best place to do this is in the vicinity of Newton Poppleford. The A3052 between Newton Poppleford and Harpford does not have a pavement and is quite dangerous, especially where the bridge over the river narrows. A new footbridge/cycleway would be a great benefit to these communities. Improving this route is not just a matter of benefitting cyclists. The green lanes in question are overgrown and muddy, so they are little used – improvement would make an attractive route for walkers. The use of green lanes for cycleways has huge advantages over the purchase of land from multiple ownerships. Perhaps the biggest advantage of the green lane/Option B, Exmouth to Sidmouth route is deliverability. This route also offers the opportunity to link with Ottery and Feniton via the Otter Valley from Newton Poppleford. Crossing the A3052 at a point in the vicinity of Otter Reach is much easier than at Bowd. My concern with the Feniton to Sidmouth option is that the cost, complexity and poor economic justification will mean that it will never happen. A quarter of a million pounds has already been spent, apparently, on studies and yet we seem no nearer implementation. So I would recommend abandoning this option, or at least placing it on the 'backburner' and instead to focus upon delivering sections of a Sidmouth to Exmouth route.		
	Policies on Economic Resilience			
Policy 18 New Retail Development	EDDC	'Proposals for new retail and commercial facilities, extensions and/ or alterations to existing facilities that serve the local community and visitors will be supported on sites within the BUAB' *(This ignores the 'town centre*		

		first' approach in the NPPF and the Local Plan. Is that intended?) '– provided they meet the following criteria in full: a. The development of a new building should not have an adverse impact on The special character of the area's natural and built environments. b. The proposal will be well related to the built form of the settlement and close to existing development.' *(This is unnecessary given that the policy only supports development within the BUAB. All such sites would be well related to the built form and close to existing development. Any important open spaces in the BUAB are protected by other policies.)* 'c. The site is accessible by a variety of types of transport, including walking and cycling and the amount of traffic generated by the proposal could be accommodated on the local highway network without detriment to road safety. d. The proposal would not be significantly detrimental to the amenity of neighbouring residents. e. The proposal does not have a negative impact on (i.e. significantly reduce the viability of) existing local businesses or community services.' - *This goes against the NPPF requirement to promote competitive town centre environments and a competitive economy. The policy should focus on improving the local economy as a whole, not on individual businesses or preventing competition.* *This measure does not promote sustainable economic development. It is a less productive form of policy intervention which harms the evolution of local economies, removing the requirement of existing enterprises to improve and adapt to maintain market share. Quality, customer choice and service, diversity and investment in skills and training can all suffer as a consequence. We would question whether the NPPF Para 17 is a strong enough reference for this section.*		The policy is aimed at small units that serve the local community, so the sequential test is not appropriate for this scale of development Good point. Agree – deleted this aspect of the policy – planning policy is not about protecting individual businesses
Policy 18 New Retail Development	Richard Heard	Need to involve the freeholders of town centre retail property not just the current users/lessees. The owners are pension funds and individuals who rely on the income and should be consulted on any development/redevelopment of the town centre		Noted

Policy 19 Facilitation of Home working	EDDC	'Proposals for house extensions and/or conversions of existing domestic buildings' *(New garden buildings for home working are often acceptable. Could these also be allowed?)* 'to allow for home-working will be supported provided that the following conditions are met in full: a. The property will continue to be used as the main private residence.' *(Perhaps replace with 'The work area would be ancillary to dwelling' or similar.)* 'b. The impact on the amenity of adjoining properties is acceptable in terms of siting, scale and design. c. That it respects the character of the surrounding area, including any historic and natural assets. and, d. The proposal would not be detrimental to the amenity of neighbouring residents by reason of increase in traffic, numbers of people visiting or activities unusual in a residential area.' (*Suggest replacing with 'or be out of character with the area'.)* e. Will not create disturbance for neighbouring residents at unreasonable hours' *(suggest removing as it suggests there are 'reasonable hours for disturbance')* 'or create other forms of nuisance such as noise or smells. Conditions to prevent the subsequent conversion of such accommodation to separate residential use will be applied.'		Agreed Agreed Agreed
	Keith Gillanders	p 38 policy 20b - Clarify. The wording is ambiguous; is change of use from business to retail or housing allowed or not?		Agreed
Policy 20 Employment Land – Brownfield Site Prioritisation	EDDC	*'Change of use of properties existing employment sites and premises allocated for business in the Local Plan such as the Alexandria Road Industrial Estate will be refused' (This potentially conflicts with paragraph 22 of the NPPF which states that policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.)* *'unless the new use provides or creates employment, with the following provisos:* ***a.** That where no occupier has been found for vacant premises which have been marketed for at least twelve months for its current use or similar uses and without success, proposals for alternative use will be*		Agreed. Reference will be included to Para 22 of NPPF The relatively small number of industrial premises justifies retaining them This link has been included as requested

		considered.' (See the marketing of commercial premises prior to COU guidance that our ED team provided to planning and is now published at: http://eastdevon.gov.uk/planning/planning-services/planning-developmentmanagement/ viability-guidance-notes/marketing-strategy-statementguidance/ We suggest you refer specifically to this guidance in Policy.) ***'b.** That it excludes change of use to retail, unless required for ancillary* *use to serve the business needs of the community, or and residential uses, even where these provide or create employment.'* *EDDC comments* *It's unclear what these statements on determining local economic capability and performance are based on. Without detracting from the value of local consultation (and Place analysis), if there is an evidence base underpinning this section, it isn't as apparent as it could be.* *A number of statements are confident but are unreferenced and don't appear backed by the sort of evidence we would expect to inform an identification of key measures to improve a local economy, for example.* *Economic resilience isn't just about being able to recover from shocks, but more so, the capability to proactively identify and avoid or mitigate these (ecological resilience). The concern is that socio-economic resilience can also follow (for a period of time at least) from a failure to accept and engage with the challenges emerging from a changing macro-economic environment. In this instance, an inability to change or unwillingness to demonstrate adaptive capability eventually leads to collapse. This was true of many former coalfield communities and is a characteristic of some coastal communities experiencing decline since the 1960's.* *The work talks about Sidmouth as having a diverse economy and we'd be keen to see this qualified. Economic activity in Sidmouth is lower than average, given the age profile. Inward investment is a common aim, requiring a diverse supply of available employment land and premises.*		Agreed All comments noted. We have expanded the references in the policy justifications noted to include narrative. Noted 'Diverse economy is mentioned in the Introduction. We have qualified further. Noted This NP can only encourage or discourage 'the allocation coming forward' in line with the outcome of our consultations, from which our policies are derived.

		Available B2, B8 premises in Sidmouth is in short supply and the NP's encouragement of the allocation coming forward is key. Harder to develop in an active, skilled local labour force which isn't currently a defining feature of the town. *Minehead faces similar issues in providing good career opportunities for young people living locally. The high level of self-employment is, on the face of it, a positive aspect of the local economy, though these are commonly in lower GVA tourism and visitor dependent sectors which experience strong reductions in seasonal income. As such, Economic Development would certainly support the year round promotion of events and festivals.*		Noted
Policy 20 Employment Land – Brownfield Site Prioritisation	Keith Gillanders	p 38 policy 20b - Clarify. The wording is ambiguous; is change of use from business to retail or housing allowed or not?		Noted. We have included a reference to the NPPF para 22 which covers change of use from business to retail under certain circumstances.
Policy 20 Employment Land – Brownfield Site Prioritisation	John Labrum	POLICY WORDING This policy seems ambiguous – the heading refers to brownfield sites, but the wording appears applicable to agricultural land allocated for employment use in the Local Plan, such as the 5 hectares at Sidford allocated as employment land. In the policy wording, does the reference to change of use apply to the current agricultural use of the land at Sidford, or does it apply to the projected employment use envisaged in the Local Plan? – this also does not seem clear. Furthermore, the wording of Proviso B seems to need attention – the present wording appears to indicate that change of use to non-employment use will be refused subject to the proviso that it excludes retail or residential use – what does this mean? The intention appears to be to provide that, even where a change of use of employment land would provide or create employment, the change of use will be refused if it represents change to retail (subject to the stated exception) or residential – if this is the intention, I think that it needs to be made clearer.		The Sidford site is a strategic policy of the Local Plan and the NP did not specifically address any issues concerning the proposed site. Other policies in the NP including those in the Built and Natural Environment may be considered applicable. Noted

		LAND AT ENGLAND'S CLOSE, SIDFORD Is it really intended that change of use from employment land to residential use will always be refused? – this does not seem appropriate. If Proviso A applies, would it override Proviso B? – this is not clear. Furthermore, the employment land may be very close to existing residential properties, so that continued employment use is inappropriate. A case in point is the land at the top of England's Close, Sidford – of an overall plot which could be used for housing, subject to planning permission, I understand that a relatively small part is a vacant, derelict building with former employment use, very close to residential properties (and with limited parking/turning space), and which has apparently been marketed without success. PROPOSED 5 HECTARES EMPLOYMENT SITE AT SIDFORD The allocation of 5 hectares of employment land at Sidford, as included in the East Devon Local Plan, is inappropriate for many reasons – for example, flood risk, unsuitable local roads, potential congestion at Sidford traffic lights, land within the AONB, need for a green wedge between Sidford and Sidbury. I appreciate that the SVNP cannot remove this allocation, but there are some caveats attached to the allocation in the Local Plan, and it seems that it would be helpful if these conditions could be replicated in the SVNP. Strategy 26 in the Local Plan (Development at Sidmouth) includes the following – • The 5 hectares of employment land at Sidford would have a particular onus on B1 space; • The 2 hectares representing the Northern part of the proposed Sidford employment site would not be allowed to go ahead if the remainder of the site has not been fully developed and occupied for employment use as to at least 90% at the first 5 year review of the Local Plan; • If the 3 hectares representing the Southern part of the proposed Sidford employment site has not been developed at the time of the first 5 year review of the Local Plan, the employment allocation for Sidmouth should be re-examined; • The proposed Sidford employment site must be subject to the highest design and landscaping standards, with wide buffers around existing homes;		The provisions of NPPF para 22 apply to this scenario. Agreed – clarification made. This is a strategic allocation in the Local Plan and it is not appropriate for the neighbourhood plan to be addressing these issues, other than as provided in policies governing our Built and Natural Environments. The Sidford site is a strategic policy of the Local Plan and the NP did not specifically address any issues concerning the proposed site. Other policies in the NP including those in the Built and Natural Environment may be considered applicable. We are unable to specify as a Policy what must be built other than as stated in our policies on the Built and Natural Environment. However, the Aims comment in point 4 on a desirable mix for the business infrastructure.

		• Retail use should not be allowed at the proposed Sidford employment site, unless the retail use is simply ancillary to the primary use of a unit. It would seem that these points should be incorporated in the SVNP as far as possible. For example, to what extent could the SVNP provide the following in relation to the proposed Sidford employment site? – • The site should only be used for business start-ups, with possibly some offices and small light industrial units in Class B1; • Any development should be low density and low rise, to provide high quality landscaping, to have regard to the AONB location, to minimise loss of amenity for nearby housing, and to endeavour to reduce the impact on flood risk; • The area between Sid Vale Close and the un-named brook which runs west to east across the site should not be developed at all, and nor should a wide area adjacent to Two Bridges Rd – in both cases to limit the loss of amenity to nearby housing; • The proposed Sidford employment site should be deleted from the Plan ort reduced ion size, depending on the situation at the first five-year review of the Local Plan (NB as at 2018, the specified period of the Local Plan has already run for 5 years, 2013 – 2017 inclusive). If possible, and to the extent that it is supported by consultation, the SVNP should specify an alternative, more appropriate location or locations for the 5 hectares of employment land at Sidford shown in the Local Plan. I understand that such an alternative location would require discussion between the SVNP Steering Group and EDDC as to why the Sidford site is considered to be inappropriate, and it would also clearly need public consultation to determine if a more suitable alternative location or locations could be identified and generally agreed on. In addition, the SVNP should replicate the conditions attached to the Sidford employment site allocation in the Local Plan, as per my previous comments. Would have liked to see more on the Two Bridges Estate. Obviously would give traffic problems and shouldn't be in AONB. Completely unsuitable and plan should have said so. Colin Boyd		

Policy 21 Renewable Energy and low carbon energy	EDDC	*'Renewable energy and **green employment** initiatives' (needs to be defined, what does this mean?) 'will be supported and encouraged. The provision of **small/domestic scale renewable energy projects**' (It is unclear whether this policy supports wind turbines. The NP group may be of the view that there are no acceptable locations. On the other hand, if there are acceptable locations then perhaps these should be promoted and identified.* *This policy could be more ambitious and identify opportunities for community renewables, including wind turbines. See 'Low-carbon Neighbourhood Planning' published by the Centre for Sustainable Energy, 2018.) 'within the Sid Valley or associated schemes for renewable energy facilities will be supported subject to the requirements…'*		**'Green employment initiatives'** refers to the creation of new activities in the renewable/sustainable energy sector which in turn create full time or part time jobs. **Re; wind turbines response to EDDC:** As a matter of policy, we avoided leading questions in our questionnaires, and therefore sought responses on renewable energy as a whole. We did however write the policy in such a way that any proposal would be considered on its merits and must meet strict conditions. Further, we did not consider any specific land allocations for any of our policies; the NP may be revised during its lifetime.
	Keith Gillanders	p39 policy 21 - clarify the intention in the wording "..or associated schemes for renewable energy facilities ...". Does this refer to large schemes such as a solar PV farm? Avoid language like ". would not adversely affect." since any development is bound to affect landscape etc; better to say "weigh any adverse effects against the benefits delivered by the scheme".		Some could be a positive benefit eg on despoiled land
	Policies on Community and Culture			
Policy 22 Protection and Enhancement of Community	EDDC	*Proposals that would result in the loss of the community facilities shown in the appendix (page 55) List of Facilities of Community Value and List and Map of Open Spaces, in addition to any assets added in the future, will not be supported unless;*		Agreed to all

Facilities and assets		***a.*** *There is no reasonable prospect of viable continued use of the existing building or facility which will benefit the local community and that such a need is evidenced for the proposed development change and:* ***b.*** *They do not have an adverse impact on the special character of the area's natural and built environment and any assets registered in the future would have the same protection.* ***c.*** *Proposals that seek to enhance or improve the Sid Valley's existing community facilities of community value will be supported where:* ***I.*** *They do not have an adverse impact on the special character of the area's natural and built environments; and,* ***II.*** *Any increased use of the amenity does not lead to significant increases of traffic volumes and impact on neighbours*.' Council Offices: Chamber and Members Room: EDD Council Offices. It is not appropriate that this room is included on the list, Council meetings are a function of the EDDC democratic function and that function is part of the EDDC relocation project. Also the Knowle site has Planning Approval for development. Port Royal Facilities Sidmouth Lifeboat facilities and Sidmouth Sailing Club are leased from **EDDC. EDDC** is the freehold owner of these sites and may have a view on this proposed listing as may the leaseholders in terms of scope for the development of their services/ club facilities.		Agreed Town clerk advised today to change STC to EDDC in terms of ownership
Policy 23 Safe Town		Is this a policy? (Chair of SVNP) Richard Thurlow thinks not. DH suggests that we delete it as policy, JS suggests deleting first part.		Delete the first sentence of the policy. Done
	Eastern Town Development			
Policy 24 Eastern Town Development	Natural England	Clarification is sought on whether the Neighbourhood plan is seeking to allocate land for development beyond that already allocated within the East Devon Local Plan. The Port Royal Site boundary shown accompanying Policy 24 is larger than allocation ED03 in the East Devon Local Plan. Clarification in the Plan text would be helpful. If the Neighbourhood Plan is seeking to		The Steering Group is not seeking to allocate land for development in Eastern Town beyond that already allocated in the East Devon Local Plan

		allocate additional land this proposal will need to be subject to SEA and HRA screening (See Annex 1). Annex 1: Strategic Environmental Assessment (SEA) and Habitats Regulations assessment (HRA) Strategic Environmental Assessment Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at: http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessmentand-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans Habitats Regulations Assessment. Where a neighbourhood plan could potentially affect a European protected site, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive, which is transposed into the Habitats Regulations. In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012, a neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out. Therefore, measures may need to be incorporated into the neighbourhood plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on European protected sites. This will be particularly important if a neighbourhood plan is to progress before a local plan has been adopted and/or the neighbourhood plan proposes development which has not be assessed and/or included in the Habitats.		Since there are no development proposals apart from the EDDC commitment to redevelop just the Drill Hall site we do not see the need for an SEA or Habitats Regulations screening.
Policy 24 Eastern Town Development	EDDC	Port Royal and place analysis There continue to be comments about Port Royal and any future development of this site having 'links to the sea' and offering community facilities, these vague and unqualified aspirations continue to be included in the text.		Please see revised policy

		In terms of the former Drill Hall, this building had no connection to the sea and it was purchased by East Devon District Council from the Wessex Reserve Forces and Cadets Association. The money received by the Wessex Reserve Forces and Cadets Association contributed to establishment of new facilities for the organisation in the town. Therefore there is no justification that this building should have further restrictions on its future use at Neighbourhood Plan level.		
Policy 24 Eastern Town Development	Richard Eley	Port Royal I would urge the Neighbourhood Plan to include the need for Port Royal to be comprehensively redeveloped as part of an overall integrated plan for the area.		Noted
Policy 24 Eastern Town Development	John Labrum	Policy 24 – Eastern Town Development The section of the SVNP dealing with the Eastern Town will presumably be revised, following the apparent decision by EDDC not to proceed with the proposed mixed use development at Port Royal (which is shown in the Local Plan), and to put the Drill Hall up for sale. There seems much to commend refurbishment of the Drill Hall for community / visitor use, and I would hope that the SVNP would support such refurbishment. The advantages of retention and refurbishment of the Drill Hall appear to include the following – • Could be made into an attractive building; • A fairly large space inside, apparently on three floors, for various community /visitor uses; • Historical aspect – retention of the building provides a link to the past, and information on the previous uses of the building would provide added interest; • Would fit in with the Conservation Area, and also appropriate as part of the setting for the World Heritage Coast; • Use of existing building should presumably be more commercially viable than constructing a new building for community use, and there is the possibility of grants being available for refurbishment of the building, subject to successful grant applications.		All Eastern Town policies reflect evidence gathered in our consultations and not specific current EDDC plans and are designed to be robust and accurately reflect any development in the area. Noted.

		An on-line petition in favour of refurbishment of the Drill Hall as a community hub, and use of the basement for a night club for young people, has apparently attracted over 1,200 supporters https://www.change.org/p/create-a-real-hub-for-the-entire-community-on-sidmouth- seafront I support the proposal for the Drill Hall to be a community hub with a night club for young people as envisaged in this petition. It seems that, in addition to community facilities, a re-furbished Drill Hall could possibly incorporate (with three floors apparently available) a restaurant or café. Consideration might also be given to the use of the Drill Hall, from time to time, as a venue for music performances (eg Folk Week) possibly including dances,		
Policy 24 Eastern Town Development	Tim and Mary Bray	The Drill Hall should be developed in a way that benefits the wider community, for children on a rainy day, for teenagers to meet up. A café during the daytime. Retain sailing club and trawlers yard. Don't destroy character of either. Definitely NO Luxury flats as proposed by our esteemed local MP. There is already a surplus of expensive retirement properties and anymore would have a negative impact on the local demographic. I was under impression that this land was protected for public use. Sort out Alma Bridge.		The SVNP can only recommend a course of action as suggested by the evidence collected in our surveys.
Policy 24	SVA	The words in this policy need amending. The phrase "development will conform to the SVNP" is self -evident. Is Eastern Town a "significant "destination? If so where is the evidence?		Noted
Policy 25 Eastern Town Access	EDDC	Not sure that a developer of just a small part of this Eastern Town area should be expected to improve the access and linkages to the town centre. E.g. If the council is only offering the Drill Hall building for redevelopment, it is an individual site and has frontage to the esplanade, so is accessible in its own right. Again, where text states developers are "expected to provide environmental and civic enhancements". Not sure that a development of just an individual small site can offer this. There is a tendency to emphasise the maritime and fishing heritage of the area, and that new development should reflect this. A development of just a small part of the Eastern Town allocated site (local plan		Policy revised

		allocation) should not be restricted to this kind of use, or to a community use, which is another aspect that the NP seems keen to focus on. Port Royal section of the 2nd consultation survey https://sidvalleyneighbourhoodplan.files.wordpress.com/2017/09/q2-reportfinal- 280917.pdf "Repeated mention of the need to retain The Ham, toilets, the Lifeboat Station, the boat park and launch area, the fish shop, the Drill Hall, the Gig Club facilities, the Sailing Club and the play park" The text refers to "repeated" mention of the retention of the Drill Hall, only 3% said they wanted it to be retained (58 people). 132 people referred to retention of the slipway, but that doesn't warrant special mention. We suggest consistency in justification of focus related to consultations.		
Policy 25 Eastern Town Access	Keith Gillander	p47 Eastern Town. Aim 5 ' The current number of parking spaces should be retained as a minimum'. Should this read 'maximum'? - providing more parking is inconsistent with trying to reduce traffic flow through the town centre.		Noted
Policy 25 Eastern Town Access	John Labrum	Car parking for local residents: port Royal and eastern Town has no parking for residents. This needs to be provided at no extra cost to permanent residents.		This is outside the remit of the SVNP and is the responsibility of DCC
Policy 26 Eastern Town Flooding				Now incorporated into Policy 24
Policy 27 Maritime and heritage	Natural England	Policy 27: Maritime Heritage Clarification is sought on the aim of this policy. It's aim would appear to be to safeguard existing uses but as worded the policy is unclear.		Policy 27 now re written.

Policy 28 Eastern Town Mixed use	John Labrum	I support the proposal for the Drill Hall to be a community hub, with a night club for young people, as envisaged in this petition. It seems that, in addition to community facilities, a refurbished Drill Hall could possibly incorporate (with three floors apparently available) a restaurant or café. Consideration might also be given to use of the Drill Hall, from time to time, as a venue for music performances (eg in Folk Week), possibly including dances. • Any development should be low density and low-rise, to provide high quality landscaping, to have regard to the AONB location, to minimise loss of amenity for nearby housing, and to endeavour to reduce the impact on flood risk; • The area between Sid Vale Close and the un-named brook which runs West to East across the site should not be developed at all, and nor should a wide area adjacent to Two Bridges Road – in both cases to limit the loss of amenity of nearby housing; • The proposed Sidford employment site should be deleted from the plan or reduced in size, depending on the situation at the first 5 year review of the Local Plan (NB, as at 2018, the specified period of the Local Plan has already run for five years, 2013 to 2017 inclusive).		The SVNP SG notes that there was considerable support for the Drill Hall to be developed partly as a community facility. This is a strategic allocation of the Local Plan
Policy 28 Eastern Town Mixed use	John & Dint Mullins	In the past many socials, charity dances and other parties were arranged at The KNOWLE, which Sidmouth council purchased for Council Chambers and would let for community use, in lieu of a" TOWN HALL". Now that we have no communal hall of any size, except for Church halls, in the town, we consider that the DRILL HALL should be given to the TOWN COUNCIL for the benefit of the community, in exchange for the KNOWLE. It could then be hired out as before and would provide a good alternative to the KNOWLE		The SVNP SG notes that there was considerable support for the Drill Hall to be developed partly as a community facility

		We consider that the Drill Hall be given to the Town Council for the benefit of the community in exchange for the loss of facilities at the Knowle which for many years as served a Town Hall for socials and charity dances.		
Policy 28 Eastern Town Mixed use	Stephen Pemberton	Please see below about use of The Ham and the Old Boat Park, and car parking for local residents. 1. Anti-Social Behaviour at The Ham and The Old Boat Park Reports of anti-social behaviour at Blackmore Gardens and Connaught Gardens have attracted much attention recently with the need to ensure this is prevented. Locking and stewarding the areas and strategies to prevent unreasonable use are being highlighted. However, The Ham playground and the Old Boat Park can become a 'Youth Club' and 'Night Club' at night throughout the year. This is a well-known, long reported and long established issue. Reporting of unacceptable behaviour receives denial, disparaging and dismissive responses from Sidmouth Town Council, The Ham Trustees (who are ALL the STC Councillors), the Local Councillor notable by his absence and inaction, and the Town Clerk. The Ham Trustees, Sidmouth Town Councillors and the Town Clerk need to act in the interests of local residents. They also need to address the needs of those unreasonably using these spaces. 2. Car parking for local residents: Port Royal and Eastern Town has no parking for local residents. This needs to be provided at no cost to permanent local residents.		Noted
Policy 28	SVA Richard Thurlow	Where do the priorities arise from? And why are they listed as an example if so prioritised? What happens if a developer wants to add additional features? Where are their priorities/		Noted

Appendix 2 Report of consultation following a community workshop KNOW YOUR PLACE

Date: Friday **27th January 2017**

Location: Kennaway House, Sidmouth, EX10 8NG

The purpose of the *Know Your Place* event was to test the emerging Vision for the Sid Valley Neighbourhood Development Plan (SVNP) see **Table One** below. Also, to establish the need for baseline evidence to support the preparation of the Sid Valley Neighbourhood Plan (SVNP).

The *Know Your Place* event therefore aimed to;

- inform people about and invite input on the Draft Vision that has been prepared following outputs from wide ranging consultation undertaken by the SVNP Steering Group. The first questionnaire was held in May 2016, followed by a full Household Questionnaire in October 2016 that established 7 Core Themes, a Survey of Business and Special Interest Groups was also run in October 2016. With the outputs of these questionnaires as well as meetings with a variety of interest groups, including a Young People's Forum, the SVNP Steering Group wanted to consult in more spatial detail on how and where development might take place within the plan period in the Sid Valley;
- advise on the process of evidence capture being led by the Steering Group and invite feedback on the emerging Place Analysis process being delivered by Creating Excellence ; and
- help the Steering Group in identifying options and questions that need to be raised in the final questionnaire that will go out to households in the final stages of consultation.

Creating Excellence (CE) brought expertise from the South West Design Review's Panel – in respect of Transport Planning (Jonathan Tricker), Urban Design (Annabel Keegan) and Landscape Architecture (Sophie Thompson). Presentations were provided by them to show best practice and explore opportunities within the context of the NP process more generally. The SVNPSG provided an overview led by Deidre Hounson (SVNP Chair) and STC Cllr Louise Cole.

The presentations were entitled,

- **Coastal character and place** – Sophie Thompson
- **Sustainable movement** - Jonathan Tricker
- **The Draft Place Analysis** (+ Introduction to workshops) – Annabel Keegan

TABLE ONE

The Sid Valley Neighbourhood Plan Vision (DRAFT)

The Context for Our Vision

The Sid Valley is comprised of four distinct but connected areas; the seaside resort of Sidmouth and the rural villages of Salcombe Regis, Sidford and Sidbury. The area has a wealth of Georgian, Victorian and Edwardian architecture which in Sidmouth, contributes to a high-status townscape of national significance. The town has a wide range of retail businesses, and offers high quality year-round accommodation of different types.

The area is renowned for its outstanding natural environment and quality of life for those who live and visit. It has a strong tourism sector which has the potential to grow and diversify. To meet the needs of our community the Sid Valley requires carefully balanced development providing suitable affordable housing for residents both young and old. Our vision through the Neighbourhood Plan promotes quality employment opportunities, revitalises tourism and connects people with what the Sid Valley has to offer.

Our Vision

Our vision is of a Sid Valley that maintains and promotes its rural coastal beauty and welcoming community, and advances its appeal to young and old through providing a vibrant diverse economy which supports a high quality of living, working and visiting.

This vision conserves and enhances our enviable picturesque location on the Jurassic Coast. It nurtures and promotes the ambience of our community to which both residents and visitors connect.

To realise our vision, our Neighbourhood Plan encourages changes which benefit our community; children and young people and families and older people and the economy.

Appropriate developments should complement and protect our natural environment whilst improving the existing built environment in our town and villages in both scale and character.

Development should reinvigorate the Eastern End of Sidmouth, known as Port Royal, to become a culturally vibrant centre for the community and visitors, incorporating facilities with links to the sea.

The 27th January event was an opportunity to invite a cross section of Sid Valley representatives together to share their knowledge in relation to their own expertise and that of their user groups. **See Table Two.**

Table Two – list of invitees

EDDC Cllrs & STC Cllrs including: Dave Barrett John Dyson,
Dawn Manley
Jeff Turner
Stuart Hughes
Richard Cohen EDDC Deputy CEO
Alison Heywood EDDC
Ed Planning EDDC
Campaign to Save Rural England
Natural England
Sustrans Rep
Richard Eley Business
Mel Gater Chamber of Commerce
other landowners
Persimmon Homes
Sid Vale Association
Knowle Drive Residents Association
Cliff Road Action Group
Pegasus Rep
English Heritage
Sidmouth Arboretum
Schools represeantative (invite 2 x 6th Formers)
Youth Community Rep (Youth Clubs)
Aaron (Youth Community worker EDDC)
Di Fuller Sidmouth Patients Forum
Sid Valley Practice doctor
Port Royal Stakeholders
Sid Valley residents (suggest at least 8)
Harrison Lavers Potbury

CLAIRE WRIGHT - SIDBURY

Chris Holland
Mary Walden-Till
Brian Fernley
Barbara Murphy
Robin Goodman
Phil Weaver
Fords South West Ltd
Fields of Sidmouth Ltd
S&D White
Dotty Home (online business chose Sidmouth to establish retail outlet)
Mary Bagwell
Sustrans Rep could include: Rupert Crosbee, Andrew Harding
East Devon AONB Partnership
Cycling interest groups; Richard Kirby
Jo Seward – Sidmouth Hotela
Robert Crick – Dissenters Hall
Sports sector - club secretaries
Port Royal reps
Head Teachers - Jim - Ingham-Hill, Paul Walker plus Sidbury and St Johns
Nicki Young - Sidmouth College
Potburys
Donkey Sanctuary
Bus Company
Manor Pavilions Theatre
Science Festival
Folk Festival
Food Festival
Restauranteurs/cafes
The Salty Monk

KENNAWAY HOUSE
CLINTON DEVON ESTATES
DREW BUTCHERS SIDBURY
Christine Wallace

ARCOTT & LYMBOURNE RESIDENTS
CHURCHES
PUBLICANS
FIRE & AMBULANCE SERVICES
EDDC CONSERVATION OFFICER
MUSEUM
TOURIST INFORMATION
EAST DEVON LEISURE - SWIMMING POOL
SPORTS CENTRE
BRENT HOTELS
EAST DEVON LEISURE - PARKS + GARDENS

SCOUTS + GUIDES
ARMY + NAVY CADETS
FRIENDS OF THE BYES
CARE HOMES REPS
BRIAN GOLDING
ENVIRONMENT AGENCY
Sidmouth Club

The day was planned around two sessions – one held in the morning and one held in the afternoon. At each session two themed table top discussions were held and participants mixed at each to allow for fresh conversation. These sessions were led through facilitation based loosely on three questions. These questions relate back to the outputs received from the SG's earlier questionnaires. At the close of each 35 minute session, feedback was shared and post-it notes or flipchart notes were made as a record. The following report provides a record of the contributions made.

Feedback

THEME: Our Built Environment (Housing Needs, Architecture) – facilitated by Annabel Keegan, CE

Question 1: How can the built environment better meet the needs of a multi-generational community?

- The Sid Valley (SV) needs to be more multi-generational – the balance is currently wrong with a bias to second homes and the older generation
- There are a lack of employment opportunities, the Sidford allocation needs to be more affordable for local businesses to grow and flourish.
- It is important to get the infrastructure right – and in smaller phases so as to ensure high quality outputs.
- Transport need to be balanced and offer accessibility to the broad spectrum of the population's needs.
- Affordable housing – a range of thresholds were suggested from 30% through to 75% low for the SV.
- All housing types should be accommodated where need exists with a mix of tenure types.
- There should be a bias towards the re-use of buildings – and support for start-up businesses, creative enterprises and the like using that space. For example, at Port Royal provision of a community hub is needed that could also house activities/facilities for bad weather.
- Housing should be built to Lifetime Homes standards so that they suit generational needs.
- Facilities on the built environment should be multi-generational – example given – that play areas are not just for children! BBQ stations, swinging seats etc. provided as well as children's play equipment – Montreal example cited.
- Self- build plots should be provided in appropriate locations, with appropriate design guidelines.

Question 2: What design qualities should new development have inside the settlement boundaries?

- Inside the settlement boundaries in the SV, there needs to be protection of key views with scale to be appropriate with any new build limited to 2 or 3 storey heights.
- Multi-storey car parks are not supported, but if allowed to be of the highest possible design standards.
- Architecture should not be pastiche or fake – that is based on copying a style or tradition, but should be of a high standard and good quality in design terms to modern construction standards.
- Quality should reflect the quirkiness of the Sid Valley. Enclaves of single-type dwellings should be avoided if possible.
- There should be an environmental focus with a landscape-first approach to any new development. New development should be landscape-led in their design. Scale and roofscape should be consistent to human scale.
- The night-time economy in Sidmouth is poor, and there should be more done to make the seafront more attractive for night-time users. The eastern side of the seafront is a gateway to the Ham that is important for festivals, as well as to the Byes that links further into the neighbourhood plan (NP) area.
- Electric bikes should be housed in accessible locations to move around the area more effectively. Sustainability should not necessarily relate to eco-building, but can take a 'fabric- first' approach to sustainability.

- Layouts should pay attention to the street – be orientated towards the street, with no blank gable ends – particularly in the town centre. That will vary as you move out towards the edges, so defining the different character types in the SV is important.
- Embed energy efficiency in any design brief – need to max out on building regulations.

Question 3: What special qualities should new development have if outside the boundary?

- In regard to architectural character – scale must be appropriate whether inside or outside the settlement boundaries – so views are not blocked, that street scenes are varied, that there is consistency of materials used and sustainability such as renewable energy is given consideration in new or refurbished buildings.
- On SHLAA sites outside settlement boundaries, such as at Sidbury Road for example there needs to be enhancement of the corridor for cycling/pedestrian movements.
- There should be no settlement creep up the Valley sides – reuse brownfield land first.
- The Green Wedge between Sidford & Sidbury should be maintained. With brownfield sites used in preference to greenfield.
- The different character areas of the SV will require different approaches in terms of scale, massing and sensitivity – notably in protecting key views in and out of the SV.
- The criteria used inside the settlement boundaries should be no different to those inside – noting the sensitivity of the AONB. Should SHLAA sites be ranked in reference for example – but what criteria should be used to deliver this.

THEME: Our Natural Environment (Green Spaces, AONB land, Preservation) – facilitated by Graham Cooper, NPSG

Question 1: Which areas and features of the landscape within & surrounding the settlements are especially important to protect?

- Concern raise about urbanization of a rural landscape.
- Coastal preservation and the AONB are the key drivers in landscape protection – reference made to the Local Plan map to evidence the designations in the SV area.
- We live in a unique valley setting.
- It is important to retain and protect the existing built up area boundary edges.
- Trees should be replenished, and regard also given to where hedges are also to be protected.
- Be made aware of where or ancient Woodlands are, our Water Meadows etc. and ensure their protection.
- The coastal paths, including the link at Alma Bridge needs attention. So that there is continuous links from the Ham, the Byes and an eco-corridor emerge for wildlife and habitats.
- Views from Trow Hill, Salcombe Hill need to be protected.
- Buildings need to be of an appropriate height ans scale.

Question 2: Which are the important views and physical connections to the landscape and where could these connections be improved?

- There is concern at 'settlement creep' – and essential that the settlement edges are retained notably at Sidford and Sidbury – the protection of the 'green wedge' is key.
- Access to the Alexandria Road Industrial Estate should be examined, with better attention given to landscaping.
- Sidford Business Park is not supported in this location due to its impact on the landscape.
- The Beach Management Plan needs to be carefully considered and taken into account – need to go for the Preferred Option.
- There are an existing c 40 footpaths/cycleways - an Eco corridor is suggested from Sidbury through the Byes to the coast but the Ham to Toll House section is problematic given also the situation with Alma Bridge. This should eb investigated as a priority.
- Boardwalks should be introduced on the beach.
- Park & Change should be kept to the south of the A3052.

Question 3: Which areas of landscape/greenspace around and within settlements have a less special or degraded quality that could potentially be improved?

- Brownfield land should be developed before greenfield land.
- The settlement boundaries should remain tightly drawn.
- Concern that Salcombe Regis's setting is being affected by adjoining developments and regard should be given to limits to protect the natural setting.
- Signposting is needed with interpretation to raise awareness of town sites – such as the Knapp, Byes etc.
- The new gym at Waitrose is in the wrong location and should be moved.
- Manor Road car park needs to be landscaped.
- The Knowle area needs to be fully investigated regarding its potential

THEME: Housing (Our needs for the next 15 years) – facilitated by Michael Earthey, NPSG

Question 1: What housing mix would be desirable for new sites?

- Is the quantum of housing allocated in the Local Plan right for the SV – 100 plus 50 windfall. Is it enough to attract the growth and population mix needed to sustain Sidmouth and the rest of the Valley? What housing mix is needed noting the attractiveness of the SV as a place to live – considered that integrtating executive homes alongside starter homes is probably not workable.
- To mix affordable housing with more expensive high-end homes is not a good idea and should be considered in separate areas.
- Starter homes are needed for first time buyers.
- Housing should be considered to the north of Sidmouth is that it is closer to good transport (bus) links.
- Good architecture should replicate successful styles of existing housing. Mill Street in general terms has been regarded positively – and seen as a best practice example.
- This is very subjective matter reliant on who and where people want to live. An exploration on the benefits of mixing tenure types in the same housing schemes was raised.
- A local council in Austria made a law that a specific square meterage in the built up area could be occupied by holiday homes and the rest must be owner occupied. Is this similar to the ST Ives ruling?
- More housing is needed, but careful thought is needed as to where and of what tenure mix.
- Guidelines are needed on windfall allocations – who should decide on their location? What if they are promoted in the AONB – how can they be sensitively dealt with, if at all?
- How can restrictions on how 2nd home ownership be introduced?

Question 2: How is design quality assessed – and what criteria needs to be used to be made more specific?

- Housing needs car parking.
- Housing could have its own SV design style.
- Design quality is a very subjective matter, but a design policy shul deb added to the NDP that should embrace innovation and high standards. Taking regard of 'townscape' should be expressed.
- Housin design should promote character but reflect the area/surroundings – to provide varierty of style and be sustainable.
- Housing should not be designed around cars – try to promote modal shift in movement.
- Excellent design makes any new housing development more appealing and acceptable.
- Design quality is subjective – but there are functional guidleines that need to be introduced. Agreed that standard housing has no place.

Question 3: What are the strengths and weaknesses of the design of recent development, what can we learn for this?

- Sidmouth has the highest ageing population in Devon and it needs to lose that stereotype and market itself as a more attractive place for younger people to live.
- Loft conversions and other changes that creep onto the streetscape can result in erosion of street character and style. Efforts should be made to resist this.
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THEME: Transport (Park and Change, shared-use pathways) – facilitated by Jonathan Tricker, CE

Question 1: How can walking and cycle links be improved across the town, what benefits could this bring?

- Cycling should be encouraged across the SV particularly in accessing Sidmouth. The Byes is a considerable asset in achieving that aim and efforts should be made to ensure there is east cycle access form the Byes in reaching the seafront.
- Linking the esplanade with the Byes through the town (as Sidmouth's two greatest assets) is essential. There should also be efforts made to improve the existing cycle routes notably from Woolbrook Road.
- Cycling is emphasised for its benefits to health but also to social cohesion.
- Cycling provision is needed from Sidmouth to Sidbury – as the current road arrangements are dangerous.
- Byes is an asset, and any links to it should be enhanced and further links encouraged – this was notable in the lack of east-west links onto the byes – these should be explored.
- A good cycle map should be produced for the SV with historic sights referenced.
- Ensure land is allocated for shared use paths/routes when development is being planned.

Question 2: How can parking be better managed for regular users and visitors alike?

- There was debate on the location of a Park and Ride/Change (P&R/C) facility – but felt that a location to the North of Sidmouth was considered sensible. Connecting any P&R/C to wider Sustrans routes, and with bicycle hire and/or bus routes was also considered important, not least to support tourism.
- The Bowd area seems an attractive location for Park & Ride (note, not Change). Another location mentioned was the Knowle (following EDDC's relocation).
- Parking – there is a need for more, or at least rationalised car parking in Sidmouth – for regular local car users, but also to accommodate visitors. A high quality multi-story car park was considered a possibility.
- Need the quality of parking and driving a pleasurable experience for visitors.
- Parking signage needs to be better for visitors when gauging availability for visitors. The role of Manor Car Park is key to potentially unlocking potential elsewhere in the town – so Manor Road could be enhanced.

- How can the viability of a Park & Ride be secured? The promotion of a Park & Change is questioned as it may only benefit those parking there to catch a bus into Exeter. A P&R is needed to relieve parking in Sidmouth – particularly at peak times.

Question 3: How can the movement and public realm in the town centre be improved over time?

- Fore Street, Sidmouth should be examined in respect of pedestrian safety – given the narrow width of pavements and the nuisance associated with circling cars seeking car parking spaces.
- The Esplanade works well for pedestrians but crossings could be improved thereby making better linkages to Fore Street and the town centre.
- Remove trip hazards on town centre pavements.
- Restrict loading/deliveries for town centre businesses that are a nuisance during trading hours.
- Improve the public realm of the esplanade to bring up to modern standards.
- Pavement need to be assesses in terms of their attractiveness for shoppers and visitors alike.
- High Street/Fore street need to be further de-trafficked to make more pleasant for pedestrians – links to Manor Road Car Park emphasised.
- Deliveries and servicing businesses out of peak times was to be encouraged.

THEME: Community & Culture, Young People (Arts, Festivals, Resources) – facilitated by Deidre Hounsom/Andie Miles, NPSG

Question 1: How can the experience of Sidmouth as a destination in the Jurassic Coast be improved for visitors and schoolchildren?

- There needs to be more awareness of our sea history and have events hosted that reflect on that – noting the need for high quality.
- Cycling should be promoted and with the Byes and potential linkage to the sea, this is a real attraction for visitors – noting the Sustans routes.
- Folk Festival has put Sidmouth on the map, and there is unrest that this festival in particular will suffer if access to the Ham a key festival site is removed/damaged.
- Sports grounds in the town of Sidmouth are a real asset and should be preserved.

Question 2: How could the cultural offer of the town be extended through the seasons, what spaces/activities could support this?

- Build on the success of the existing festivals in Sidmouth – and not necessarily establish any new ones.
- There is concern re the increase (perceived) in second homes – particularly starter-sized homes in/near the town centre. Suggest looking at the St Ives NDP policy in efforts to understand if replication in Sidmouth justified.
- An Aquarium was suggested.
- The Farmer's Market could be expanded and improved.
- What is the SV's arts offer – an audit should be undertaken, with plans put in place to protect community assets – such as the cinema that is in a key town centre site.

- The Sidmouth Herald is a key asset that supports community cohesion.
- Support the trend of multi-purpose holidays that widens the appeal for visitors but also shares the potential for local businesses to benefit.
- Sidmouth's history should be better promoted – key being the fishing heritage.
- Festivals – Sidmouth is seen as a festival town – that should not be overlooked.
- Excellent broadband is essential.

Question 3: Are there any gaps in provision of social spaces for young people of different ages?

- A lot of public buildings in the SV are not being used to their full potential, and young people are not catered for adequately, particularly in the winter months. These buildings should have their uses expanded to appeal to younger people who will otherwise travel to Exeter for greater choice.
- The SV is considered a safe place, and Sidmouth considered a safe town within that. Agreed Sidmouth should be seen as the focal point for facilities.
- It is expected for young adults to flee Sidmouth – but should they be encouraged to stay? If so, what do they want to see happen.
- Shared workspace is needed to encourage start-ups and entrepreneurial collaboration.
- STC should see itself as a media hub in social media terms and extend its reach to younger people.

THEME: Economic Resilience (Maintaining a Thriving Economy) – facilitated by Peter Murphy, NPSG

Question 1: What types of employment space are needed over the next 15 years?

- Facilities for STEM businesses/start-ups – Science, Technology, Engineering, Mathematics
- Spaces for existing Sid Valley Industries/Light industry/Essential Services. Essentially providing space for goods, services, manufacturing etc. which would make the Sid Valley largely self-sufficient, encouraging a buy local ethos within East Devon.
- Units encouraging creative uses
- Business Park offering flexible space for start-ups; affordable space for young people to start their own businesses.
- Office and workshop space; NO large storage/distribution units
- Spaces that create opportunity, foster discussion, access to advice and guidance
- Affordable space, making use of Change of Use permissions in Brownfield Sites as a priority.
- We should make better use of existing areas such as Laundry Lane and the Manstone Depot.
- Make use of change of Use permissions to convert unused/derelict buildings in AONB land, e.g. farm buildings. An example was given of converting chicken sheds for start-up units.

- Start up space for businesses requiring larger space (about the size of the Kennaway House Cellar bar). Examples of business sites that might be worthy of emulation are in Newton Poppleford and Budleigh Salterton.
- We need fewer charity and clothes shops and not seek to be a 'clone' down, instead developing the town space as unique, mature, special, individual.
- The gross allocation of employment space in the Local Plan is excessive and could be reduced to levels consistent with existing and projected demand. We should explore smaller scale opportunities.
- We should beware of the threat posed to town centre footfall and therefore economic viability by the development of edge-of-town industrial or retail spaces.
- Generally, small companies only have access to spaces inappropriate or inadequate for their needs. We should develop quality offices, and a work hub to encourage entrepreneurialism, encouraging businesses into the area, particularly those run by younger age groups, professionals, technology and modern internet based industries.

Question 2: What design guidance should the neighbourhood plan give for of the developers of employment space?

- New builds should protect and project the towns essential architectural character, be respectful of existing materials used in construction, and retain a period feel. We have a hard-to-define 'time warp' profile which must be retained as it essential to the town's charm.
- Sidmouth has a low-rise profile; new buildings should not exceed 4/5 stories or the prevailing roof heights in the contextual area and not adversely affect sea and cliffscape views to West and East.
- Developments should maintain and project a feeling of open space, with green areas which bring families together for socializing and multi-age activities.
- Pedestrian and cycling access to be a priority.
- Preserve the character of existing shops.
- Capitalise on and develop brownfield sites as a priority.
- Buildings should be low rise in nature, and reflect the rural or local environment in the choice of construction materials. NO flat roofs.
- Secure units should be available.
- Where appropriate for neighbourhoods, time restrictions for earliest access and latest close-up might be considered.
- Aspirationally, reserve some units for young person's startups.
- Buildings and spaces should be respectful of our historical uniqueness and architectural excellence.
- There should be an open approach to modern architectural design proposals, but buildings should be fit for purpose and in sympathy with their surroundings, whether rural or urban.
- Roxburgh should be taken as an example of 'Never Again in Sidmouth' architecture.
- Buildings should be energy efficient.

Question 3: How could development at Port Royal or improvements to the town centre or esplanade benefit economic resilience or development?

- We should take account of our history and play to our strengths, particularly our maritime location and history.
- We should respect the views of established and loyal visitors to Sidmouth who come for a traditional seaside holiday and continue to cater to that market.
- Harbour/jetty/marina would attract the boating community and foster water-borne links to neighbouring coastal communities.
- One group session was unanimous that the Esplanade should remain unchanged.
- Attract young families to live in the area.
- Tourism does change in nature, and the tourist profile has already developed beyond the traditional seaside holiday – (e.g. people seeking activities/health/personal development/sporting/wellness, spiritual development/learning.
- The town lacks a decent bar and restaurant with sea views, suitable for the visitor profile.
- We should recognize that *hundreds* of bed/room spaces have been lost in recent years and assess supply against demand and build/encourage replacement of lost beds/rooms accordingly.
- We should recognize the progress that has already been made/occurred naturally or through promotions by local businesses; we should be better at promoting and publicizing our attractions taking into account modern day internet search behavior and expectations.
- Consider options for making the seafront more attractive throughout the day and evening, exploiting views to West and East.
- The PR area should be a gateway to the Ham, to the Seafront, and to the existing town centre. There should be attractive and engaging walkways to link to the old town, creating an urban and curiosity-provoking urban vista.
- Maximum use should be made of potential extra space for construction by integration with Flood Defense/BMP infrastructure.
- The existing turning circle should be close to traffic with the space used to extend the recreational area of the Ham.
- Developments should recognize and take advantage of Sidmouth's residential and visitor profiles:
    - 'Silver Money' – affluent, discerning residents and visitors
    - Young professionals – attracted by up-market/high quality retailing
    - Seasonal: Make maximum use of applicable local spaces to offer 'pop-up' stalls, food outlets to provide a diverse, eclectic range of foods and market-style trading reflecting modern tourist expectations for locally produced foods, artisan products, and sea food specialities.
    - Boutique retail for all age groups including young people, collectors.
- People should not arrive at the PR area by car; those arriving on foot or by bike stay longer and spend more. The Manor Road car park could be developed as the main town centre park. It was suggested that running a frequent Hopper Bus service from Manor Road into Sidmouth and PR would be self-funding.
- Promote and attract active tourism to the international visitor capitalizing on our countryside and coastal profiles.
- Use flood defense/beach management new infrastructure for public, beach-oriented leisure. Integrate any land space gained by Port Royal redevelopment to provide a high-quality restaurant bar with panoramic sea views, preferably owned by a high profile "Name "chef
- The town and the Sid Valley should make maximum use of natural assets, architecture, hotels, enviable location, extensive maritime and sporting history. "Sweat the Assets"

- Examples were given of successful visitor attractions such as the Red Arrows, and existing festivals. Ideas developed include promoting Sidmouth as a photogenic location for beginning tours (e.g. Tour of Britain), product promotions. More use could be made of the Esplanade for income generation and visitor attractions during tourist seasons. We should identify and encourage more festivals. Some however disagreed and there should be no catering or retail on the Esplanade.

- The tourist and leisure offer should be kept up to date with modern expectation. "Sustain and Develop"
- We should recognize that Exeter is 'not a threat' to our economic viability and seek to make our retail environment recognizable as catering for a diverse but up market tourist and residential mix. Our tourist and leisure promotions should amplify not only our location and connections, but also a quality place to shop and dine.
- The area around the Sorting Office is dead space, and could be enlivened with imaginative retailing including area for young people to get together socially.
- Port Royal should be a new hub with spaces for social use, restaurants, cafes, theaters, outdoor catering and activity spaces. It should provide a green link with the Byes. A suggestion was made to incorporate a 'business hub' space for people to discuss ideas, opportunities and network.
  The Byes are underexploited and should be rethought for residents and as a tourist attraction, offering spaces for new recreational uses, for example, lakes, wildlife habitats, birdlife, cafés and seasonal sheltered outdoor eating. Note, one other view was that the Byes are idyllic as a area for walking and should remain unchanged.
- There was comment that town centre lighting was 'appalling' and should be brought up to date to make the evening town experience more subtle, atmospheric and inviting.
- When considering how to market Sidmouth and the towns and rural areas of the Sid Valley, we do not have a clear Definition of our Uniqueness – (why visit us/why we are different). We should develop and market a Vision Statement and take into account changes in how consumers search for information using the internet and mobile platforms, and adapt our marketing accordingly.

THEME: Sidmouth, Port Royal Redevelopment – facilitated by Sophie Thompson CE

Question 1: What mix of uses would contribute to the vitality of the town centre?

- Important to zoom out from Port Royal and take a wider perspective – to understand the environment and practical issues associated with it – that is the sea wall, the cliffs and exposure to the sea and wind resulting in erosion.
- Protection on this SE corner of the seafront needs to be resolved, with not least retention of the 360degree views.
- There needs to be better community uses provided on this part of the seafront.
- The relationship with the seafront with a water-based focus is important.
- Although securing affordable housing is important in the NDP area, there was reservations about the commercial reality of providing the housing needed in this location.
- The development needs to be high quality with a restaurant with terrace overlooking the sea.
- Parking could be either as an under-croft arrangement or not at all – but agreed, that any parking should not be visible on the seafront.
- Public toilets are an essential eyesore in this location so they need incorporating in any scheme.

- There is a lot of knowledge – plans have been in discussion over a lot of years. A jetty or pier is favoured, that appears to be a positive proposal – to allow for a different water based experience – for locals and visitors alike, combined possibly with a coastal protection role?
- The Drill Hall should be maintained with a multi-purpose use for the community.
- The Ham should remain green-land although discussion mentioned a botanical garden, it was agreed that its use for events was more important.
- The relocation of the Life Boat Station might prove to be an important development opportunity – to open up potential for the fish shop, gig club – perhaps open a new fish restaurant.
- The area north of the play area is underutilised and could be redeveloped as the location for housing.
- A pier would be a good idea and build that strong relationship to the sea.
- Need appropriate town centre use – and assess the appropriateness of redevelopment of existing buildings.
- The allotted site abuts onto the Swimming Pool site – how can the PR development aim to enhance this important community asset for the SV – not only for its existing use, but for wider leisure uses including extending the building for gym use for example.

Question 2: What are the important pedestrian and cycle links to the site, where could these be improved?

- The Ham is an essential multi-user event space but the play area needs improving as does the concrete area behind. The Pumping station area should be looked – in particular to build on the existing residential area that has gradually been bought over as second homes.
- For walking and cycling, the relationship to the seafront, and more widely to the Byes and the town centre needs to be strengthened.
- Awareness that in any commercial development, that deliveries need to be accommodated – and turning circles maintained.
- Car parking in the vicinity of the Ham is essential.
- A link is needed from the Byes direct to the seafront – perhaps along the river?
- Pedestrian links are essential – should there be a circular route? A study is needed perhaps to assess that potential – a policy in the NP?

Question 3: What design guidance should be given to developers of this important site?

- Heights need to be managed – at height of adjoining hotel building or lower – latter felt more appropriate given cliff views and beyond. Should a detailed study be made to assess the heights of any proposed new developments at Port Royal?
- The green identity to the seafront needs to be brought back.
- The Drill Hall and Sailing Club etc. ate held in local regard, need to decide is refurbishment appropriate here. How would residential sit alongside these uses – not thought appropriate, and believed should be pushed back away from the seafront – behind the play area.
- Character of the 'old town' should be retained wherever possible – therefore any new build should be 'light touch' to retain the old fisher area.
- The longevity of this asset needs foremost to be protected from erosion from the sea. With this said, is housing there in the right location?
- The views onto the Jurassic Coast are essential particularly for visitors, so the massing and heights of development on that corner need to be sensitively assessed.
- The finer grain, details of any environmental improvements in the public realm needs to be carefully thought through – that is the design of seating, choice of paving, railings etc.
- The area needs an appropriate theme – can elegance and style in keeping with the regency reputation be considered? No need to replicate themes from elsewhere perhaps.